

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

8-22-2

ENFORCEMENT REFERRAL

TO: JOHN SKOVIAK THROUH KAREN WARD DATE: 4/2/86
FROM: TERRY OSTRANDER thru TOM DONWELL REGION: SOUTHERN
RE: ICI AMERICAS INC NID0000692970 MANTUA GROVE RD.
Name of Facility ID Number Location Address
LOT 35 A BLOCK 350 B WOODBURY CITY GLOUCESTER
Lot and Block Township County
ICI AMERICAS, INC. P.O. Box 900, WOODBURY NJ 08096
Mailing Address Responsible Party RAY NOTARO

The attached inspection/investigation report(s) dated 1/16/86 is being referred and it is recommended a POV / PSO be issued for violations of:

NJAC 7:26- 1.4(a)(5);(ii) NOT MAILING COPIES OF MANIFESTS TO THE STATES
9(Exemptions) } ACC. OF HW FOR > 90 DAYS; OPERATOR OF
12.1 et seq } STORAGE FACILITY

NJSA 58:10- _____

Suggested penalty: MIN

ADDITIONAL COMMENTS:

REVIEWED AND APPROVED BY:

W. Blawie

43-8 K.W.
to BCE

08-22-12

To
10/28/87

ICI Americas Sampling Plan

Prepared by L. Range and J. Allen

Proposed Date

October 22, 1987

Scope

ICI Americas is being sampled to meet EPA requirements of sampling RCRA notifiers during the assigned RCRA inspection.

Background

ICI Americas, established in 1979, is located on Mantua Grove Road in West Deptford Twp., Gloucester County. The facility, a division of Rubicon Chemicals, Inc., is the Polymer Engineering and Research Lab where research and development work in the plastics (urethane foams) field is performed. No manufacturing is performed onsite, according to our files. Further process information will be obtained during the course of the forthcoming RCRA inspection.

The facility, EPA ID #NJ000692970, is listed as a generator only. Wastes are generated from the lab and from the pilot plant. Raw materials include methylene chloride, acetone, isopropanol, methanol styrene and stryrene. Copies of manifests in the office file indicate liquid quantities of D001, F002, F003 and F005 have been generated.

Storage

Storage of all waste is in drums.

Sampling Containers

Sample containers and deionized water will be provided by Century Labs of Therofare, NJ. All containers will be decontaminated, on ice and in coolers provided by the lab. Century Labs will also perform the analyses.

Sampling and Analyses

Composite sampling will be performed on representatives of the waste streams. Liquid samples will be collected with dedicated glass thief's, while any solid samples will be collected with dedicated scoops.

Field Preparation Technique (QA/QC)

A trip and field blank will be included in the sample container provided by the lab for the purgeable organics

analyses.

Protective Equipment

Level B protection will be worn by the samplers. This will include SCBA, gloves (surgical and butyl), saraneks and boots.

Sampling Team

The sampling team will consist of Linda Range and Jack Allen.

Analyses to be Performed

It is not yet known exactly what wastes will be encountered onsite during the course of the inspection. Anticipated, however, are waste chlorinated solvents, styreneated polyesters and isocyanates. Potential analyses will be purgeable organics, ignitability and possibly cyanides. A representative sample of each waste stream will be collected.

ERF America

Linda → file EF-22-1



RECEIVED

APR 6 1988

Division of Waste Mgmt

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Acting Director
401 East State St.
CN 028
Trenton, N.J. 08625
609-633-1408

M E M O R A N D U M

MAR 31 1988

TO: Linda Range, Case Manager
Bureau of Field Operations - SFO

THROUGH: Wayne Howitz, Section Chief
QA/QC Section - Bureau of Compliance & Technical Services

FRDM: Ruark Smith, Environmental Specialist *(initials)*
QA/QC Section - Bureau of Compliance & Technical Services

SUBJECT: Century Laboratories Inc. P2468
Laboratory Data Review

INTRODUCTION

A quality assurance review was performed by Ruark Smith on the Tier II data deliverables submitted by Century Laboratories Inc. to RCTS on 12/2/88. Five oily aqueous samples were collected by ~~Raymond L. Neiman~~ in accordance with DEP guidelines. Linda Range requested that the following analyses be performed:

1. Volatile Organic Analysis (EPA Method 624 - aqueous samples; EPA Method 8240 - non-aqueous samples)
2. Various Inorganic Analyses

RESULTS OF REVIEW

I. GENERAL REQUIREMENTS

The test report is assembled in the proper format with all required information provided. The chain of custody is adequate.

II. HOLDING TIMES

The samples were collected on 10/22/87. On 10/22/87, the samples were delivered to the laboratory.

The volatile parameters were analyzed on 10/27, 28/87 and 11/4/87. The holding time criteria has been met.

The extraction for the volatiles analysis was performed on 11/3/87. The analysis was performed on 11/4/87. The oily non-aqueous samples did not exceed the extraction holding time criterion of EPA Method 624. The analysis holding time of 40 days has been met for all five non-aqueous samples.

All samples for the various other matrices were extracted and/or analyzed by 11/3/87. All holding time criteria for the various miscellaneous parameters have been met.

III. VOLATILE ORGANIC ANALYSIS

A. GC/MS Tune Performance

There were no problems associated with the mass calibration nor the ion abundance criteris for the BFB tunes.

B. GC/MDS Initial Calibration

The initial calibration was performed at three (3) concentration levels. All of the required calculations were completed.

C. GC/MS Continuing Calibration

The data for the continuing calibration is acceptable.

D. Surrogate Spikes

The required surrogate spiking was performed. All data is within control limits.

E. Matrix Spikes

The required matrix spike analyses were performed.

F. Blanks

No compounds were detected in any of the blanks.

G. Samples

Samples LR045 and LR047 required substantial dilution due to the presence of a target contaminant, this made detection limits rise proportionally.

H. Overall GC/MS Performance

The instrument's overall performance was good. The average RFs for the system performance check compounds (SPCC) were well above 0.05.

IV. INORGANIC ANALYSIS

A. Miscellaneous Inorganic Analyses

There was no EP Toxicity analysis performed in this laboratory data package. The only other analyses performed in this laboratory data package was the Reactivity (40 CFR 261.21) and the ignitability test (40 CFR 261.21). The remainder of the data for the various parameters is not reliable (see conclusion).

CONCLUSIONS

I. GENERAL REQUIREMENTS

The required information is provided. The chain of custody is adequate.

II. HOLDING TIMES

All of the holding times criteria have been met.

III. VOLATILE ORGANIC ANALYSIS

The percent recovery for all of the non-aqueous matrix spike and spike duplicate analysis was calculated correctly the data is reliable.

IV. INORGANIC ANALYSIS

The data for the various miscellaneous inorganic analyses are not reliable because Century Labs had another laboratory do the flashpoint determinations (on page 14 of the laboratory data package).

V. INVOICE PAYMENT

I recommend that 20% of the invoice payment for the various miscellaneous inorganic analyses (flashpoint) portion only be withheld in accordance with 5.29.3.2c of the contract X-085.

RS/cs



8.22.12.

State of New Jersey

**DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT**

John J. Trela, Ph.D., Acting Director
20 East Clementon Road
Gibbsboro, NJ 08026
609-446-8000

March 30, 1988

ICI Americas, Inc.
PO Box 900
Woodbury, NJ 08096

Dear Mr. Notarot:

Pursuant to N.J.S.A. 13:1D-9(d), the State of New Jersey, Department of Environmental Protection, enclosed is a copy of the analytical report relative to the sampling performed at your facility on October 22, 1987.

This report contains analytical data for the following:

<u>Sample #</u>	<u>Test Report #</u>	<u>Sample Obtained From</u>
LR-045	F2468	Drum marked methylene chloride
LR-046	F2468	Drum marked isocyanate
LR-047	F2468	Drum marked poly-all

Please review the enclosed report(s) and contact this office if you have any questions.

Sincerely,

Jack Allen
✓ Jack Allen
Env. Specialist

JA:krb
cc: Wayne Howitz
case file
enclosure(s)

RECORDED	EAST CARLTON DRPHL	WILMER BRAHMIN VENOM
1.1. CLASSIFICATION	EDISON	06051 201-321-0035
WASTE CODES	U001 U002 U003	
NJ0980042072	BRICKYARD RD.	CARLSON WILLIAM MGR. MAI
IBM CTRP - BIOMEDICAL SYSTEMS		08312 201-329-7700
WASTE CODES F001		
NJ0073439261	401 PARKWOOD PLAZA JER	MARSHALL RICHARD L. 06418 201-640-2607
ABC SITE - SURFACE TRAVERSEMANIA LAKE		
WASTE CODES U000 U018 U000 U226		
NJ0000692970	MANTUA GROVE RD	GRETCH GERALD ADM ASST
ICI AMERICAS INC	HOLUBURRY	08090 609-423-7400
WASTE CODES U000 U001 U002 U003 F002 F003 F005 P001 P002 F003		
WASTE CODES P004 P005 P006 P007 P008 P009 P010 P011 P012 P013		
WASTE CODES P014 P015 P016 P017 P018 P020 P021 P022 P023 P024		
WASTE CODES P026 P027 P028 P029 P030 P031 P033 P034 P035 P037		
WASTE CODES P038 P039 P040 P041 P042 P043 P044 P045 P046 P047		
WASTE CODES P048 P049 P050 P051 P054 P056 P057 P058 P059 P060		
WASTE CODES P062 P063 P064 P065 P066 P067 P068 P069 P070 P071		
WASTE CODES P072 P073 P074 P075 P076 P077 P078 P081 P082 P084		
WASTE CODES P085 P087 P088 P089 P092 P093 P094 P095 P096 P097		
WASTE CODES P098 P099 P101 P102 P103 P104 P105 P106 P107 P108		
WASTE CODES P109 P110 P111 P112 P113 P114 P115 P116 P118 P119		
WASTE CODES P120 P121 P122 U001 U002 U003 U004 U005 U006 U007		
WASTE CODES U006 U009 U010 U011 U012 U014 U015 U016 U017 U018		
WASTE CODES U019 U020 U021 U022 U023 U024 U025 U026 U027 U028		
WASTE CODES U029 U030 U031 U032 U033 U034 U035 U036 U037 U038		
WASTE CODES U039 U041 U042 U043 U044 U045 U046 U047 U048 U049		

NOTE: Facility filled in protecting file / submitted all facility waste codes that could be used

NOTIFIERS LIST

FACILITY ID FACILITY NAME	STREET ADDRESS CITY	CONTACT ZIP TELEPHONE
WASTE CODES U050		
WASTE CODES U051 U052 U053 U055 U056 U057 U058 U059 U060 U061		
WASTE CODES U062 U063 U064 U065 U066 U067 U068 U069 U070 U071 U072		
WASTE CODES U073 U074 U075 U076 U077 U078 U079 U080 U081 U082		
WASTE CODES U083 U084 U085 U086 U087 U088 U089 U090 U091 U092		
WASTE CODES U093 U094 U095 U096 U097 U098 U099 U101 U102 U103		
WASTE CODES U105 U106 U107 U108 U109 U110 U111 U112 U113 U114		
WASTE CODES U115 U116 U117 U118 U119 U120 U121 U122 U123 U124		
WASTE CODES U125 U126 U127 U128 U129 U130 U131 U132 U133 U134		
WASTE CODES U135 U136 U137 U138 U139 U140 U141 U142 U143 U144		
WASTE CODES U145 U146 U147 U148 U149 U150 U151 U152 U153 U154		
WASTE CODES U155 U156 U157 U158 U159 U160 U161 U162 U163 U164 U165		
WASTE CODES U166 U167 U168 U169 U170 U171 U172 U173 U174 U175		
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WASTE CODES U187 U188 U189 U190 U191 U192 U193 U194 U195 U196		
WASTE CODES U200 U201 U202 U203 U204 U205 U206 U207 U208 U209		
WASTE CODES U210 U211 U212 U213 U214 U215 U216 U217 U218 U219		
WASTE CODES U220 U221 U222 U223 U224 U225 U226 U227 U228 U230		
WASTE CODES U231 U232 U233 U234 U235 U236 U237 U238 U239		
NJ0001767944	EAST 22ND ST & AVENUE	BARKER JOSEPH SITE MANAG
ICI AMERICAS INC	DAYUNNE	07002 201-858-8900
PROCESS CODES S01		
WASTE CODES U000 U001 U002 F002 F003 F004 F005 P022 U002 U031		
WASTE CODES U044 U112 U134 U147 U154 U159 U160 U186 U196 U197		
WASTE CODES U211 U220 U223 U226 U228 U238 U239		
NJ0104695450	ROUTE 9 LUR TEXAS R#	IDA ROBERT
IDA AUTOMOTIVE	MORGANVILLE	07751 201-591-1245

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

08-22-12

SAMPLING PLAN

CASE NAME: ICI Americas, Inc.

CASE NUMBER: 08-22-12

ADDRESS/LOCATION: Martins Creek Rd
W. Deptford

CONTACT PERSON: Ray Natale

TELEPHONE #: 423-2700

REGION: INFO MFO DFO HFO OTHER

FUNDING SOURCE: SPILL FUND HAZARDOUS WASTE (RCRA)
 OTHER:

ESTIMATED COST FOR SAMPLING: \$ 260.00

PROJECT ACTIVITY CODE: HHS

ANTICIPATED DATE OF SAMPLING: 10/22/12

TO BE COMPLETED BY THE DA SECTION

DATE PLAN RECEIVED: _____

DATE ASSIGNED: _____

REVIEWER'S NAME: _____

SATISFACTORY

UNSATISFACTORY. EXPLAIN DEFICIENCIES:

DATE CASE MANAGER WAS NOTIFIED OF THE DEFICIENCIES: 10/22/12

COMMENTS:

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

I. WHAT INFORMATION WILL THE SAMPLING PROVIDE?

Samples will determine actual waste streams and classifications as appears to reported, as well as satisfy EPA requirements of performing a sample inspection at a CRT verifier facility.

II. HOW MANY SAMPLES WILL BE COLLECTED? 3

TRIP BLANK FIELD BLANK

TOTAL NUMBER OF SAMPLES:

III. IDENTIFY THE AREAS TO BE SAMPLED:

AREA/LOCATION	SAMPLE MATERIAL
1. Drum Storage	liquid
2. Drum Storage	liquid
3. Drum Storage	liquid
4.	
5.	
6.	
7.	
8.	
9.	
10.	

LABORATORY NAME: Century Labs

CONTRACT LABORATORY: YES CONTRACT #: X-085
 NO, EXPLAIN _____

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

IV. IDENTIFY THE ANALYTICAL PARAMETERS THAT EACH SAMPLE WILL BE ANALYZED FOR:

1. SAMPLE AREA / LOCATION	1. ANALYTICAL PARAMETERS
11. Drum - Methylene Chloride	Purgeable Organics, Ignitable
12. Drum - Isocyanate	Reactivity, Ignitability, Total Gounds
13. Drum - Polyol	Purgeable Organics, Ignitable
14.	
15.	
16.	
17.	
18.	
19.	
20.	

LEVEL OF DATA DELIVERIBLES:

- TIER I - TIER II

TASK SAMPLE ANALYSIS WILL BE PERFORMED:

- TASK I (AIR POLLUTION) - TASK II (AQUEOUS)

- TASK III (NON-AQUEOUS) - TASK IV (CLP HSL COMPOUNDS)

- TASK VI (AQUEOUS HSL COMPOUNDS)

- TASK VII (NON-AQUEOUS HSL COMPOUNDS)

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

VI. DESCRIBE HOW THE SAMPLES WILL BE COLLECTED:

Liquid samples will be collected by clear glass tube directly from each drum. There to be dedicated.

WHAT SAMPLING EQUIPMENT WILL BE UTILIZED:

GLASS TUBE
 TANK COLAWASA
 DRUM COLAWASA
 BACON BOMB

SCOOP
 AUGER
 POND SAMPLER
 BRILER

OTHER (describe):

VII. INDICATE CONSTRUCTION MATERIAL OF SAMPLER:

Clear Glass Tube

VIII. WILL DEDICATED SAMPLING EQUIPMENT BE UTILIZED?

YES NO. IF NO, DESCRIBE THE DECONTAMINATION PROCEDURES THAT WILL BE UTILIZED:

IX. IF DEDICATED SAMPLING EQUIPMENT IS USED, CHECK ONE OF THE FOLLOWING THAT APPLIES TO THE SAMPLING EQUIPMENT CLEANING:

EQUIPMENT WAS LABORATORY CLEANED. LABORATORY NAME
PERFORMING THE CLEANING: *4006*

IS THIS THE SAME LABORATORY THAT WILL BE PERFORMING THE SAMPLE ANALYSIS? YES NO

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

X. DESCRIBE THE TYPE OF SAMPLE CONTAINERS THAT WILL BE USED IN THE SAMPLE COLLECTION:

Containers to be provided by analysis

Portable Organics - Set of clear glass vials

Reactivity, Total Cyanide, Ignitability, unk as yet

WILL THE SAMPLE CONTAINERS BE SUPPLIED BY THE LABORATORY THAT WILL PERFORM THE ANALYSIS?

YES NO, IF NO, WHERE WILL THE BOTTLES BE SUPPLIED FROM:

DESCRIBE HOW THE SAMPLE CONTAINERS WILL BE CLEARED PRIOR TO THE COLLECTION OF SAMPLES:

LABORATORY, NAME OF LABORATORY: Century Labs

IS THIS THE SAME LABORATORY THAT IS PERFORMING THE ANALYSIS? YES NO

FIELD. DESCRIBE THE CLEANING PROCEDURE:

HOW WILL THE SAMPLES BE PRESERVED?

ICE 4C (ORGANICS, AQUEOUS, NON-AQUEOUS).

NITRIC ACID pH<2 (TOTAL METALS ONLY, AQUEOUS).

SODIUM HYDROXIDE pH>12 (CYANIDES, AQUEOUS).

SULFURIC ACID pH<2. (PHENOLS, OIL & GREASE, AMMONIA, COD, NITROGEN ORGANIC & KJELDAHL, NITRATE-NITRITE, ORGANIC CARBON, PHOSPHORUS-TOTAL, AQUEOUS).

HYDROCHLORIC ACID (ORGANIC CARBON, AQUEOUS).

OTHER: -----

HOW WILL THE SAMPLES BE TRANSPORTED TO THE LABORATORY?

SAMPLER, LIST NAME: L. Range

COMMERCIAL COURIER, LIST NAME: -----

LABORATORY WILL PICK UP.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

- X1. DESCRIBE THE LEVEL OF PROTECTION THAT WILL BE REQUIRED DURING THE SAMPLING:

LEVEL OF PROTECTION: -A -B -C -D unless site circumstances indicate downgrade acceptable

LIST THE NAMES OF SAMPLING PERSONNEL THAT WILL BE ON SITE DURING THE SAMPLING EPISODE:

NAME	AFFILIATION
1. Linda Range	SFO
2. Todd Allen	SFO
3.	
4.	

WHAT WILL BE THE ESTIMATED TOTAL TIME ON SITE? one day

WHAT WILL BE THE ESTIMATED TOTAL TIME WEARING PROTECTIVE EQUIPMENT? 1 to 2 hrs

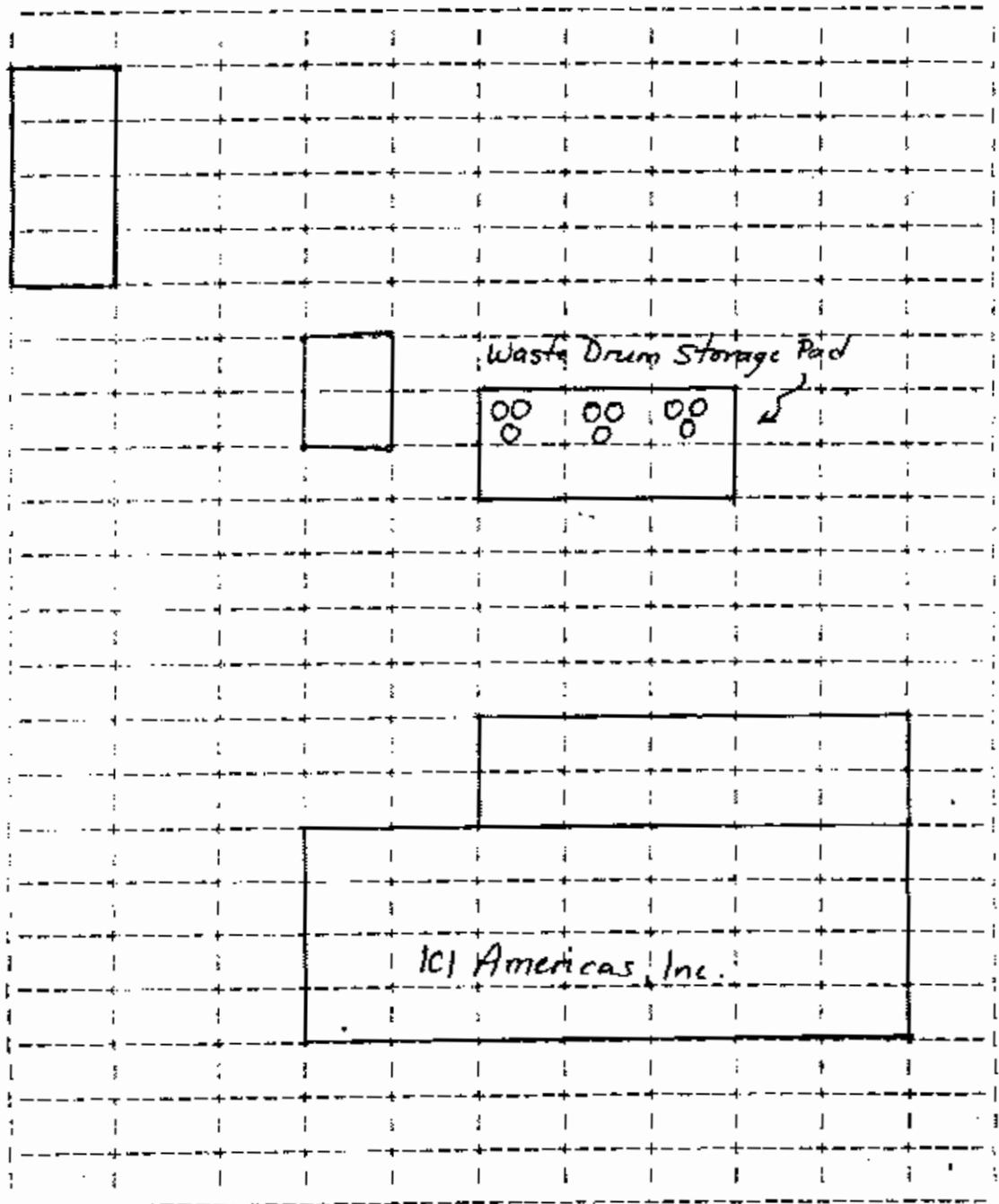
COMMENTS: Inspection and sampling to be overseen by Washington DC headquarter EPA personnel as part of Land Bee logo exercise.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SAMPLING PLAN

V. INDICATE ON THE SITE MAP BELOW, THE AREAS THAT WILL BE SAMPLED.

SAMPLE LOCATION MAP



NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
BUREAU OF FIELD OPERATIONS

SAMPLE REQUEST

P# 1 of 7

NAME: <u>J.C. Amicoes Inc.</u>	CASE #: <u>2. Range 1/2 Alpha</u>	LABORATORY NAME: <u>Century</u>
IN REQUESTING ANALYSIS: <u>Soil</u>	SPILL FUND <input type="checkbox"/> OTHER <input checked="" type="checkbox"/>	LABORATORY ADDRESS: <u>1000 University Ave.</u>
ISS: <u>Gibbsboro</u>	PHONE #: <u>727-4445</u>	Telephone: <u>727-4445</u>
TE NUMBER: <u>727-4445</u>	SAMPLE MATRIX: I. AQUEOUS <input checked="" type="checkbox"/> II. NON-AQUEOUS <input type="checkbox"/>	
If non-aqueous, indicate which matrix applies:		
A) Soil, hydrosoils, sediments <input type="checkbox"/> B) Organic Liquid <input type="checkbox"/> C) Industrial sludge, paint sludge <input type="checkbox"/> D) Process sludge, process wastes, still bottoms <input type="checkbox"/> E) Chemical solids <input type="checkbox"/> F) Solid waste <input type="checkbox"/> G) Biological tissue <input type="checkbox"/>		

METERS	SAMPLE #	COST/PARAMETER	ADJUSTED PRICE ACCORDING TO MATRIX	# SAMPLES/ PARAMETERS	
				PERCENT INCREASE/ MATRIX	TOTAL COST
Organic & Acrylonitrile (GC/MS)					
Neutral Extractables (GC/MS)					
Greable Organics (GC/MS)					
Orientation Hydrcarbons (GC/MS)					
Arophenony Acid Herbicides					
monochlorine Pesticides & PCBs (GC/ECO)					
monochlorine Pesticides & PCBs (GC/MS)					
monochlorine Pesticides & PCBs (GC/NSD)					

CASE #:

TEST	SAMPLE #	ADJUSTED PRICE ACCORDING TO MATRIX		# SAMPLES/ PARAMETERS	TOTAL COST
		COST/PARAMETER	PERCENT INCREASE/ MATRIX		
phosphate Pesticides (GC/MS)					
phosphate Pesticides (GC/NPD)					
cinated biphenyls (F36) 6					
brominated Diphenyl Oxides					
BOD (GC/MS)					
lorinated Biphenyl Individual mpound and/or Isomer					
Termination (GC/MS)					
lorinated Biphenyls Aroclor etermination (GC/ ECD)					
lorinated Biphenyls Aroclor termination (GC/HSD)					
lorinated Biphenyls Aroclor termination (GC/PID)					
icarboxylic Acids (GC/UV/ Fluorescence)					
leum Hydrocarbons Individual GC/FID)					
leum Hydrocarbons Individual GC/FID)					
late Ascers (GC/ECD)					
late Esters (GC/FID)					
able Organics (GC/HSD)					
able Organics (GC/PID)					

LAW: 1st Americas, Inc.CASE #: 4

TESTS	SAMPLE #	COST / PARAMETER	PERCENT INCREASE /	ADJUSTED PRICE ACCORDING TO MATRIX	# SAMPLES / PARAMETERS	TOTAL COST
USEPA Priority Pollutant Organics (Purgeable, Pest/PCBs -K/Facid Extractables)						
able Organics (GC/FID)						
ile Organics (Static Headspace) GC/FID)						
ile Organics (Static Headspace) GC/MSI						
ile Organics Tenax-R Sample GC/FID)						
ile Organics Tenax-R Sample GC/ECD)						
ile Organics Tenax-R Sample GC/MSI						
ile Organics (Carbon Tube Selection Sample) (GC/FID)						
ile Organics (Carbon Tube Selection Sample) (GC/FID)						
ile Organics (Carbon Tube Selection Sample) (GC/MS)						
LIAISIS ivity (40 CFR 261.21) ability (40 CFR 261.21) ivity (40 CFR 261.22)) CFR 261.22)						

NAME:	CASE #:	SAMPLE #	CUST/PARAMETER	ADJUSTED PRICE ACCORDING TO MATRIX	# SAMPLES/ PARAMETERS	TOTAL COST
NETTSS						
Action Procedure Toxicity (Total)						
(40 CPA 261.24)						
Action Procedure Toxicity (Heavy Metals Only)						
Action Procedure Toxicity (Chlorinated Pesticides Only)						
Structural Integrity Test						
Characterization						
Characterization						
mo Aromide						
mo Iodide						
XRD (X-Ray Diffraction)						
EDOS (Transmission Electron Microscopy)						
PLM (Polarized Light Microscopy)						
Trinited Dibenzofuran (GC/MS)						
ret						
ICP (ICP)						
lime						
sulfur						
zinc						
ide						
phosphorus						
ALs						
sulfur						

NUMBER - 050 - 870 - SAMPLE TEST

Americas, Inc.

CASE 47

STATION	SAMPLE #	COST/PARAMETER	PERCENT INCREASE/ MATRIX	ADJUSTED PRICE ACCORDING TO MATRIX		# SAMPLES/ PARAMETERS	TOTAL COST
				1	2		
101	1						
102	1						
103	1						
104	1						
105	1						
106	1						
107	1						
108	1						
109	1						
110	1						
111	1						
112	1						
113	1						
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350	1						

08-22-12

NO. _____

FIELD SAMPLING DATA SHEETDATE 6/22/87

HW/EF # _____

E.P.A. ID # _____

CASE NAME ECE AmericanTIME OF SAMPLING 1450 HOURSLOCATION Mantua Grove Rd
W. Dept
Gloce Co

COLLECTED BY:

L. Range / T. AllenCONTACT: Ray Notaro

RECORDED BY:

L. RangeFIELD SAMPLE NO. A LCR-44

B _____

SPECIFIC SAMPLING SITE:

- DRUM # 4/114
 TANK TRAILER # _____
 STATIONARY TANK # _____
 HORIZONTAL VERTICAL UNDERGROUND
 TOP MIDDLE BOTTOM
 OTHER _____

SAMPLING CONTAINER:

- GLASS PLASTIC ignitable
 OTHER _____

CONTAINER VOLUME:

- PINT QUART
 OTHER 0.1 40 ML VOL

CONTAINER FILLED: YES NO

CHAIN OF CUSTODY INITIATED

- YES NO

TYPE OF SAMPLE:

- LIQUID SLUDGE
 SOLID SOIL
 OTHER _____

CHARACTERISTICS OF SAMPLE:

- TURBID TRANSPARENT
COLOR sl. yellow
ODOR _____
OTHER _____

SUSPECTED SUBSTANCE(S):

methylene chloride

ADDITIONAL INFORMATION:

methylene chloride
aqueous mat'l
analyse for VO's, ignitability

08-22-12

NO. _____

FIELD SAMPLING DATA SHEET

DATE 10/22/87

HW/EF # _____

E.P.A. ID # _____

CASE NAME ICE Plant, ca.

TIME OF SAMPLING 16:27 HOURS

LOCATION Planting Grove Rd.
W. Dept.
Gloce Co.

COLLECTED BY: L. Range / T. Allen

CONTACT: Rey Notaro

RECORDED BY: L. Range

FIELD SAMPLE NO. A 42047

B _____

SPECIFIC SAMPLING SITE:

- DRUM # 41-2
 TANK TRAILER # _____
 STATIONARY TANK # _____
 HORIZONTAL VERTICAL UNDERGROUND
 TOP MIDDLE BOTTOM
 OTHER _____

TYPE OF SAMPLE:

- LIQUID SLUDGE
 SOLID SOIL
 OTHER _____

SAMPLING CONTAINER:

- GLASS PLASTIC
 OTHER _____

CHARACTERISTICS OF SAMPLE:

- TURBID TRANSPARENT
COLOR black - clear streaks
ODOR sunk
OTHER _____

CONTAINER VOLUME:

- QUART QUART
 OTHER oz./ 40 ML.

CONTAINER FILLED: YES NO
yes inflatable

CHAIN OF CUSTODY INITIATED

- YES NO

SUSPECTED SUBSTANCE(S):

- Fugitive Polyol

ADDITIONAL INFORMATION:

sample sl. viscous,
contained many sm.
bubbles

consistency of maple syrup
analyse for ro. flash

28-22-12

NO. _____

FIELD SAMPLING DATA SHEETDATE Oct 22, 1982

HW/EF # _____

E.P.A. ID # _____

CASE NAME ICI AmericasTIME OF SAMPLING 1520 HOURSLOCATION Mantua Grove Rd

COLLECTED BY:

W. DeptL. Range, T. AllenGloce CoRECORDED BY: L. RangeCONTACT: Ray NotaroFIELD SAMPLE NO. A 120 46

B _____

SPECIFIC SAMPLING SITE:

 DRUM # 1C1J

TYPE OF SAMPLE:

 LIQUID SLUDGE TANK TRAILER # _____ SOLID SOIL STATIONARY TANK # _____ OTHER _____ HORIZONTAL VERTICAL UNDERGROUND

CHARACTERISTICS OF SAMPLE:

 TOP MIDDLE BOTTOM TURBID TRANSPARENT OTHER _____COLOR brown _____

SAMPLING CONTAINER:

ODOR unk _____ GLASS PLASTIC

OTHER _____

 OTHER _____

CONTAINER VOLUME:

SUSPECTED SUBSTANCE(S):

 PINT QUART156 CYLINDER OTHER 0Z/ ML.

ADDITIONAL INFORMATION:

CONTAINER FILLED: YES NOsl. viscous liquid

CHAIN OF CUSTODY INITIATED

analyze for ignitability,
reactivity, Total cyanide YES NO



RECEIPT FOR PROPERTY

10/15/87

OSWER 9938.1

Inspector: Ack Allen
Address: 20 E. Cuyahoga Rd.
Cleveland, OH 44115
Telephone No: (409) 344-8000

DRAFT

RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

<u>T.I.T. Americas Inc</u>	<u>WANTON Grove Rd.</u>		
<u>A. Handler Name</u>	<u>B. Street (or other identifier)</u>		
<u>WANTON GROVE RD</u>	<u>08026</u>		
<u>C. City</u>	<u>D. State</u>	<u>E. Zip Code</u>	<u>F. County Name</u>
<u>Research & Development Facility</u>			
<u>G. Nature of Business; Identification of Operations</u>			
<u>R&D 200-632970</u>			
<u>H. EPA ID #</u>	<u>Raymond Notaro (409) 423-7400</u>		
<u>I. Handler Contact (Name and Phone Number)</u>			

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

- a. F001 Yes No
b. F002 Yes No
c. F003 Yes No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? Yes No n/a

- d. F004 Yes No
e. F005 Yes No

2. Source of the above: Form 8700-12 _____; Part A _____; Part B _____;
other (specify) MANIFESTS.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:

Handler Name: F.C.C. Americas
ID Number: 100000000000000000
Inspector: J. Basser
Date: Oct 26, 1987

B. EDDAT Treatability Group - Treatment Standards Identification Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

Yes No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

- a. Knowledge of wastes Yes No
b. TCLP Yes No
c. Other (specify)

If knowledge, note how this is adequate:

Digitized by srujanika@gmail.com

If determined by TQLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency:

Note any problems: _____

d. Were wastes tested using TCLP when a process or wastestream changed? Yes No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? Yes No
 Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3] Yes No

If they looked into their history
they would have been given an
understanding of themselves.

D. Management

- #### **1. Onsite management**

- a. Were F-solvent wastes managed onsite? Yes No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: I.C.I. Americas
 ID Number: NJ2000492970
 Inspector: J. J. Jansen
 Date: Oct. 22, 1987

- b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?

Yes No

If yes, TSDF Checklist must be completed.

- c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?

Yes No

2. Offsite Management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? Yes No

(ii) Applicable treatment standard? Yes No

(iii) Manifest number? Yes No

(iv) Waste analysis data, if available?

Yes No

BETC STATED THAT THEY WERE TOLD BY USEPA (WASHINGTON D.C.) THAT THEY ARE A STORAGE FACILITY, AND SINCE THEY WOULD BE THE GENERATOR WHEN THEY SENT THE MATERIALS WHICH IT WENT TO THE DISPOSAL FACILITY THAT BETC SHOULD SUPPLY DATA.

Identify offsite treatment facilities A, B, C

- b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]: N/A

(i) EPA Hazardous waste number? Yes No

(ii) Applicable treatment standard? Yes No

(iii) Manifest number? Yes No

(iv) Waste analysis data, if available?

Yes No

(v) Certification that waste meets treatment standards? Yes No

Identify land disposal facilities receiving the BDAT certified wastes

Handler Name: I.C.I. Americas
 ID Number: 400006912400
 Inspector: J. Bauer
 Date: Oct 22, 1987

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]? Comments
- ____ Yes No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SOG) [268.50(a)(1)]?

____ Yes No

If yes, was facility operating as a TSD under interim status or final permit? ____ Yes No n/a

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.) - n/a

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ____ Yes No

If yes, list type of treatment unit and processes

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-829

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: ICI Polyurethanes (Div. of ICI Americas)

FILE NUMBER: 082212

VHT FACILITY FILE NUMBER: _____

PERMIT #: Generator Only

REGION: S

INSPECTION DATE: December 4, 1989

INCIDENT/CASE NUMBER: SGHSDWUO INSP.

INSPECTION TYPE: C.E.I.

RESPONSIBLE AGENCY CODE: NJDEP

INSPECTOR'S NAME: Jack R. Allen

INSPECTOR'S AGENCY: Haz Waste Mgt

INSPECTOR'S BUREAU: Field Operations

EPA ID NUMBER: NEDOC0692970

ADDRESS:

Mantua Grove Road

Woodbury, N.J. 08096

LOT: 35A BLOCK: 350 D

COUNTY: Gloucester

FACILITY PERSONNEL: Ray Notaro - Env. Eng.

TELEPHONE #: (609) 423-7460

OTHER STATE/EPA PERSONNEL: R. Gomez - NJDEP/DHWM

REPORT PREPARED BY: Jack Allen

REVIEWED BY: Tony W. Ostrandier

DATE OF REVIEW: 1/30/90

TIME IN: 12:15

TIME OUT: 12:45

PHOTOS TAKEN YES NO IF YES, HOW MANY? _____

SAMPLE TAKEN YES NO NO. OF SAMPLES _____

NJDIP SAMPLE IDs: _____

RADIOMETERS RETRIEVED YES NO

" No. of manifests in compliance All

" No. of manifests not in compliance None

" The manifest document numbers of those manifests not in compliance.

-41-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:

I.C.I. POLYURETHANE (A DIV. OF I.C.I. AMERICAS) IS A RESEARCH AND DEVELOPMENT FACILITY FOR THE POLYURETHANE FOAM INDUSTRY. THIS SITE, WHICH INCLUDES BUILDINGS AND THIRTY ACRES, WAS PURCHASED FROM SHELL OIL CO. IN 1979 AND CURRENTLY EMPLOYS APPROXIMATELY 85 PEOPLE.
MOST OF THE R&D WORK PERFORMED IS RELATED TO THE AUTOMOTIVE MANUFACTURING AND BUILDING INSULATION INDUSTRIES. AS PART OF THE FACILITY'S OPERATION, THREE (3) SMALL PRODUCTION UNITS ARE INTERMITTENTLY RUN TO PRODUCE VARIOUS PRODUCT FORMULATIONS FOR EVALUATION.

I.C.I. POLYURETHANE, WOODBURY PLANT, NOTIFIED AS A GENERATOR (90 DAY) OF HAZARDOUS WASTE. WASTE IS HANDLED IN DRUMS (55 GALLON STEEL) STORED OUTSIDE ON A CEMENT PAD WITH CURBING INSTALLED FOR CONTAINMENT. ALL HAZARDOUS WASTE IS MANAGED BY A.E.T.C. WITH ULTIMATE DISPOSAL TO INCINERATION AND / OR FULL BURNDOWN.

WASTE STREAMS GENERATED ARE MOSTLY FROM THE SMALL PRODUCTION UNITS. NEW PRODUCT MATERIALS INTRODUCED INTO THESE UNITS INCLUDE SOLVENTS, ISOCYANATES, AND POLY-AMINE (A HIGH MOLECULAR SUBSTANCE - NON-HAZARDOUS, NON-REGULATED). THE EQUIPMENT IS CLEANED OUT FOR A SHORT PERIOD OF TIME AFTER WHICH IT IS FILLED UP WITH PRODUCT MATERIALS AND REFILLED WITH NEW. THE MATERIAL THAT IS REMOVED IS PLACED IN DRUMS STORED NEXT TO THE PRODUCTION UNITS. WHEN FULL THESE DRUMS ARE SEALED, LABELED, DATED AND SUMMERIZED IN THE OUTDOOR DRUM PAD.

THE ISOCYANATE MATERIAL IS RESOLD TO OTHER PRODUCT MANUFACTURERS REQUIRING A LOWER CYANATE PRODUCT MATERIAL.

-A2-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

THIS MATERIAL MAY BE REMOVED FROM SITE AS A HAZARDOUS WASTE
IF (DUE TO VARYING SITUATIONS) IT IS DETERMINED TO SOLIDIFY TO AN
VISUALABLE STATE

THE ONLY WASTE IS ROUTINELY GENERATED AND MANAGED AS A HAZARDOUS
WASTE IS SPENT SOLVENT (FOAM, FOAM) AT THIS TIME. RECORDS SHOW
THE GENERATION OF THIS MATERIAL HAS DECREASED OVER THE LAST
TWELVE MONTHS. THE FACILITY REPRESENTATIVE STATED THAT THIS
IS DUE TO THE INSTALLATION OF TWO (2) NEW FOAM PRODUCTION UNITS,
WHICH REPLACE OLDER TYPES. THESE NEW UNITS DO NOT HAVE THE
SOLVENT RESERVOIRS BUILT INTO THEM AS DO THE OLDER TYPES.
INSTEAD, AIR PRESSURE IS USED TO BLOW OUT THE MAJORITY OF
THE ISOCYANATE / POLY-UREA, AND A SMALL AMOUNT OF SOLVENT IS
FLUSHED THRU THE MACHINE AFTER EACH RUN.

MOST OF THE OTHER HAZARDOUS WASTE GENERATED IS FROM THE
RED LAB. RECORDS SHOW A WIDE VARIETY OF LAB PACKS AND
SMALL INVENTORY BEING SHIPPED OFF-SITE AS HAZARDOUS WASTE
WASTE OIL (X726) FROM ROUTINE EQUIPMENT MAINTENANCE IS ALSO
GENERATED.

- 1 -

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (cont'd from p. 1)

Describe the activities that result in the generation of hazardous waste.

- 1) SPENT SOLVENTS - CLEANING OF PRODUCTION MACHINES (ECC2, ECC3)
- 2) WASTE OIL - EQUIPMENT MAINTENANCE (X-726)
- 3) OFF-SPEC (OUT OF DATE/USE) LAB CHEMICALS - R&D WORK (VARIOUS)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

DRUM ACCUMULATION AREA:

- (3) - 55 GALLON DRUMS SPENT METHYLENE CHLORIDE - F002

SATELLITE AREA:

- (1) - 55 GALLON DRUM (APPROX 1/3 FULL) - F002

<u>GENERAL</u>		<u>GENERAL CHECKLIST</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-7.4(a)I	Does the Generator have an EPA ID number?		X	—	—
HAZARDOUS WASTE DETERMINATION					
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?		X	—	—
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process? - Some wastes, mainly LHS (hazard chemicals (out of date, etc.)		X	—	—
	Is the waste hazardous?		X	—	—
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?		X	—	—
MANIFESTS					
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).		X	—	—
7:26-7.4(a)4i	The generator's name, address and phone number.		X	—	—
7:26-7.4(a)4ii	The generator's EPA ID number.		X	—	—
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.		X	—	—
7:26-7.4(a)4iv	The hauler(s) EPA ID number.		X	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.		X	—	—
7:26-7.4(a)4vi	The TSF's EPA ID number.		X	—	—
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.		X	—	—
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?		X	—	—
7:26-7.4(a)4viii	Special handling instructions --				

YES NO N/A

7:26-7.4(3)	Did the generator describe all H.O.S. wastes in Section J?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-7.4(a)5i	Sign the manifest certification by hand?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSD and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7:26-9.3

Accumulation Time

How is waste accumulated on site?

- Containers
 Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
 Tanks (less than 90 days)
 Above ground
 Below ground
 Surface impoundments
(complete HWMF (TSD) Facility Checklist)
 Piles (complete HWMF checklist)

YES NO N/A

7:26-9.3(a)1

Is waste accumulated for more than
90 days? X STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS
FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
<u>Containers</u>			
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). 55 GALLON STEEL OR PLASTIC DRUMS OF SPENT SOLVENT.	—	—
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking? If no, describe the problem (include number of containers involved.)	X	—
7:26-9.4(d)4i	Are all containers securely closed except those in use?	X	—
7:26-9.4(d)4ii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	X	—
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?	X	—
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	X	—
7:26-9.4(d)5	Is the container storage area inspected at least daily?	X	—
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?	X	—
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment? Prior to Shipment off-Site	X	—
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?	X	—

YES NO N/A

7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	<u>Y</u> <u> </u> <u> </u>
<u>Tanks (Less than 90 day storage)</u> - No TANK STORAGE OF HAZARDOUS WASTE		
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	<u> </u> <u>X</u> <u> </u>
	If yes, describe the tank(s): 1) Capacity _____ 2) Shell thickness _____ 3) Material Construction _____ 4) Age of tank _____	
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?	<u> </u> <u> </u> <u>X</u>
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	<u> </u> <u> </u> <u> </u>
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	<u> </u> <u> </u> <u>X</u>
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?	<u> </u> <u> </u> <u>X</u>
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?	<u> </u> <u> </u> <u>X</u>
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?	<u> </u> <u> </u> <u>X</u>
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?	<u> </u> <u> </u> <u>X</u>
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent	<u> </u> <u> </u> <u>X</u>

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-10.5(c)2ii	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	—	—	X
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	—	—	X
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	—	—	X
7:26-10.5(d)1ii	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	—	—	X
7:26-10.5(d)1ii	Does the containment system consist of material compatible with the wastes being stored?	—	—	X
7:26-10.5(d)1iii	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	—	—	X
7:26-10.5(d)1iii	Is the tank protected from contact with accumulated liquids?	—	—	X
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	—	—	X
7:26-10.5(d)2	Is run-on into the containment area prevented?	—	—	X
	If not, explain.	—	—	X
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	—	—	X
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	—	—	X

YES NO N/A

7:26-30.5(d)4i	If the collected material is hazardous waste under NJAC 7:26-8, is it managed as a hazardous waste in accordance with all applicable requirements of this chapter?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-9.4(g)4	<u>Personnel Training</u>			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6iii	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of			

YES NO N/A

7:26-9.6	<u>Preparedness and prevention</u>	
	Does the facility comply with preparedness and prevention requirements including maintaining:	
7:26-9.6(b)1	An internal communications or alarm system?	X — —
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	X — —
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	X — —
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system? City water	X — —
7:26-9.6(c)	Is equipment tested and maintained?	X — —
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	X — —
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	X — —
	If no, please explain.	
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required? Due to the quantity and quality of wastes. Explain.	X — —
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:	X — —
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and exits, etc.	—

YES NO N/A

7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplier Auto, Rolling Fire Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? OR S.TU THIS AM.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.71	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-9.4(g)8i	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)8ii	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If yes, did the owner operator provide those specific local officials with written approval of the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

YES NO N/A

- 7:26-9.7 Contingency Plan and Emergency Procedures
- 7:26-9.7(a) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water? X —
- 7:26-9.7(b) Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? X —
- 7:26-9.7(c) Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? X —
- 7:26-9.7(d) Did the owner or operator prepare a Spill Prevention, Control, and Counter-measures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq. — X
- If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section? — — X
- 7:26-9.7(e) Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services? X —

YES NO R/A

- 7:26-9.7(f) Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates? X ____
- 7:26-9.7(g) Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities? ✓ ____
- 7:26-9.7(h) Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary route could be blocked by releases of hazardous waste or fires)? X ____
- 7:26-9.7(i) Is a copy of the contingency plan and all revisions to the plan:
1. Maintained at the facility; ✓ ____
 2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)? ✓ ____
- 7:26-9.7(k) Is there an employee on site or on call at all times with the responsibility of coordinating all emergency response measures? X ____

6/3/90
Handler Name: E.G.T. POLYURETHANE
ID Number: NHD000062910
Inspector: J. ALLEN
Date: Jan 4, 1990

Comments

APPENDIX A-1

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following FOO1 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Does the handler generate any of the following FOO2 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

3. Does the handler generate any of the following FOO3 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either impure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
acetone - Solventines	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
cyclohexane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If the FOO3 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No w/a

Handler Name: J.C.L.
ID Number: _____
Inspector: _____
Date: _____

Comments

4. Does the handler generate any of the following P004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

creosols and cresylic acid
nitrobenzene

Yes No
 Yes No

5. Does the handler generate any of the following P005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

Yes No
 Yes No
 Yes No
 Yes No
 Yes No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

Yes No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

Yes No

If the answer is yes, list the constituents.

METHYLCHEM CHLORIDE, ACETONE

(c) Diluents?

Yes No

If the answer is yes, list the constituents.

Handler Name: XCI
ID Number:
Inspector: J. M. Ligon
Date: _____

Comments

(d) Extractants? Yes No

If the answer is yes, list the constituents.

CFC's, solvents, alcohols, C₄-C₆ hydrocarbons, etc.

(e) Fabric scouring? Yes No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? Yes No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. Yes No

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixtureblend. For example:

5% methylene chloride
2% trichloroethylene
25% 1,1,1-trichloroethane
68% mineral spirits
100%



See Computer Printout

If the wastestream is a mixture containing a total of 10% or more by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

Handler Name: ECT
ID Number:
Inspector: H ALLEN
Date:

Comments

With respect to the P003 solvent wastes, if, before use, the waste stream is mixed and contains only P003 constituents, it is a listed waste. For example:

33% acetone
16% methanol
31% ethyl ether
100%

If in light of the above, the handler appears to be generating P001-P005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

(10/30/90)

Inspectors: T. ALLEN
 Address: 20 E. CALUMETTON RD.
GLOUCESTER, NJ 08032
 Telephone No: (609) 346-8000

RCRA LAND DISPOSAL RESTRICTION GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name I.C.I. POLYURETHANES (A DIV. OF I.C.I. AMERICAS)-MANTUA GROVE RD. B. Street (or other identifier) 8.

C. City WOBURN D. State NEW JERSEY E. Zip Code 08096 F. County Name GLOUCESTER

G. Nature of Business; Identification of Operations: SIC Code(s) RESEARCH AND DEVELOPMENT FACILITY IN URETHANE FORMS

H. EPA ID # NJD000442970

I. Handler Contact (Name and Phone Number) Ray NOTARO - ENGINEERING SUPERVISOR

II. GENERATOR COMPLIANCE

A. Waste Identification	<u>Comments</u>
-------------------------	-----------------

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 Yes No

(ii) F003 Yes No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No N/A

b. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Reports _____
other (specify) _____

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: REC
ID Number:
Inspector:
Date:

Comments

misclassified F-solvents. Appendix A-2 presents a list of corresponding F and U wastes. Note concerns below:

NONE NOTED

2. Dioxin wastes

- a. Does the bandler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 Yes x No
(ii) F028 Yes x No

[F-solvent DDT standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 x Yes No
(ii) D004 - D011 x Yes No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides?

x Yes No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code.

x Yes No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]?

x Yes No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? PA

x Yes No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

WASTES WERE ALL LISTED AS A PA. x Yes No

OVER 50% OF THE WASTE WAS CHEMICALS.

REAGENT IS ONLY USED FOR CLEANING. NO WASTE AVAILABLE.

* A potential violation is indicated

Handler Name: TCX
ID Number:
Inspector:
Date:

Comments

If "no" is answered to both parts of this question, a violation is indicated. (§268.7(a))

Describe the nature of the records:

PH TESTING FOR DOAS, OTHERWISE PH & US AS

LISTED ARE UNIDENTIFIED AS SUCH.
MOST RESTRICTED WASTES, AS
GENERATED, ARE UNUSUALS FOR
THEIR INTENDED PURPOSE, OFTEN
TECHNICAL OR SCIENTIFIC Grade
LAB CHEMICALS

- f. Source of the above: Form 8700-12 ; Part A
 ; Part B ; Biennial/Annual Report ;
other (specify) - MINERALS FLUORIDE

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:
ONE (1) SHIPMENT IN 1989 - U-188

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

N/A

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? Yes Not N/A

- e. Source of the above: Form 8700-12 ; Part A
 ; Part B ; Biennial/Annual Report ;
other (specify) - MINERALS

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? Yes No N/A

*/ A potential violation is indicated

Handler Name: I.C.R.
ID Number: _____
Inspector: _____
Date: _____

Comments

3. F Solvents - -

- a. Did the generator correctly determine the appropriate treatability group (§268.41) of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

Yes No*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg (§268.32(h))?

Yes No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) (§268.7(a))?

Yes No*

- b. Does the facility handle K061 wastes?

Yes No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories ($\geq 15\%$ Zn) (§268.7(a)) (§268.41(a))?

Yes No* N/A

- c. Does the facility handle K101 or K102 wastes?

Yes No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories (§268.7(a)) (§268.41(a))?

Yes No* N/A

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

Yes No

Handler Name: T.C.R.
ID Number:
Inspector:
Date:

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes Yes No

- (i) List wastes for which "applied knowledge" was used:

WATER - OFF SPEC OUT OF DATE/USE LAB CHEMICALS
Solvents - Parts Gross Composition w/ no constituents.

b. TCLP Yes No

- (i) List wastes for which "TCLP" was used:

solids

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? Yes No

If yes, list: _____

c. Total waste analysis Yes No

- d. If files were retained, describe content and basis of applied knowledge determination:

MATERIALS FOR MY WASTE SUBSTANCES AND
SOLVENTS (NO PRODUCT GROSS INFO)

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____ ~1/a

Note which wastes were subjected to which tests:

- Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) none

Handler Name: T.C.E.
ID Number:
Inspector:
Date:

Comments

- a. Were wastes tested using TCLP or total constituent analysis when a process or waste stream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]? Yes No ✓
2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: Listed as illustrated
as P3, A-9, E Source

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes* No

D. Management

1. Onsite management

- a. Were restricted wastes managed onsite? Yes X No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? Yes X No

If yes, TSDF checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [§268.7(a)(1)]:

(i) EPA Hazardous Waste Number? X Yes No

(ii) Corresponding treatment standard? X Yes No

(iii) Manifest number? X Yes No

(iv) Waste analysis, if available? X Yes No

* A potential violation is indicated

Handler Name: T.C.I.
ID Number:
Inspector:
Date:

Comments

Identify offsite treatment facilities M.G.T.C.
Phoenix, Arizona

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

- (i) EPA hazardous waste I.D. number? Yes No*
- (ii) Corresponding treatment standard? Yes No*
- (iii) Manifest number Yes No*
- (iv) Certification regarding waste and that it meets treatment standards? Yes No*

Identify land disposal facilities receiving the BDAT certified wastes

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? Yes No*
- (ii) Corresponding Treatment Standards? Yes No*
- (iii) All applicable prohibitions? Yes No*
- (iv) The manifest number? Yes No*
- (v) The date the wastes are subject to prohibitions? Yes No*
- (vi) Does generator keep records of all notifications/certifications send to offsite facilities? Yes No*

w/a

Handler Name: ICF American
ID Number: _____
Inspector: _____
Date: _____

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]:

w/n

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

w/n

The EPA Hazardous Waste Number? Yes No*

Applicable prohibitions? Yes No*

The manifest number? Yes No*

Waste analysis data, where available?
 Yes No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? Yes No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? Yes No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? Yes No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? Yes No*

Handler Name: ECC Americas
ID Number: _____
Inspector: _____
Date: _____

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? Yes No w/a
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No w/a

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? Yes No

If yes, was facility operating as a TSDF under interim status or final permit [§262.34(b)]? Yes No w/a

If yes, TSDF Checklist must be completed.

**F. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)**

w/a

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? Yes No

If yes, list type of treatment unit and processes

If yes, TSDF checklist must be completed.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 14:1 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD000692970	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 06/24/2014	Evaluation Type:	
Location County Code:	None Chosen	Focus Area:	
Location City:		Violation Type:	
Location Zip Code:		Display Code Descrip.:	Yes
State District:	None Chosen	Display Universes:	Yes
Sort Order:	Region, State, Handler Name		

Results

Data meeting the criteria you selected follows.

Total Pages: 6 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_fola.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmeccmp3, ccitation3, hreport_univ5, luj_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:41 PM

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:41 PM

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HUNTSMAN INTERNATIONAL LLC, NJD000692970, WEST DEPTFORD, NJ, continued -

Enforcement	Activity Location:	NJ	Type:	120	Action Date:	01/16/1986	Responsible Person:	NJ	Appeal Initiated:	Appeal Resolved:
Docket:	Agency:	State								
CA Component:	h	Disposition Status:								
Activity Location:	NJ	Type:	262-A	Determined Date:	01/16/1986	Determined by Agency:	State	Responsible Agency:	State	
Scheduled Compliance Date:		Actual Compliance Date:		10/22/1987	RTC Qualifier:	UNVERIFIABLE		Sequence Number:	3	
CEI Evaluation	01/16/1986	Activity Location:	NJ	By: State	Identifier:	OC2	Person:	R2DEP	Branch:	Found Violation: YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subfile C:	NO	Day Zero:	Focus Area:	
No Linked Enforcements										
Activity Location:	NJ	Type:	262-A	Determined Date:	01/16/1986	Determined by Agency:	State	Responsible Agency:	State	
Scheduled Compliance Date:		Actual Compliance Date:		10/22/1987	RTC Qualifier:	UNVERIFIABLE		Sequence Number:	4	
CEI Evaluation	01/16/1986	Activity Location:	NJ	By: State	Identifier:	002	Person:	R2DEP	Branch:	Found Violation: YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subfile C:	NO	Day Zero:	Focus Area:	
No Linked Enforcements										
Evaluations With No Violations:										
CEI Evaluation	12/08/2004	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	001	Person:	SOTWO
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	S
CEI Evaluation	03/24/2000	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	000	Person:	NJMH
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	S
CEI Evaluation	06/08/1999	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	000	Person:	NJRG
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	S
CEI Evaluation	03/16/1998	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	000	Person:	NJMG
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	S
CEI Evaluation	12/20/1997	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	006	Person:	R2DEP
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	
CEI Evaluation	12/22/1998	Activity Location:	NJ	By: State	Sampling:	NO	Identifier:	005	Person:	R2DEP
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	
CEI Evaluation	11/03/1988	Activity Location:	NJ	By: State	Sampling:	NC	Identifier:	004	Person:	R2DEP
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	
CEI Evaluation	12/22/1987	Activity Location:	NJ	By: State	Sampling:	NC	Identifier:	003	Person:	R2DEP
Citizen Complaint:	NO	Multimedia Inspection:	NO		Not Subfile C:	NO	Day Zero:		Branch:	

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:41 PM

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HUNTSMAN INTERNATIONAL LLC, NJD000692970, WEST DEPTFORD, NJ, continued -

NRR Evaluation Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Not Subtitle C: NO	Person: Day Zero:	Branch:	Found Violation: NO Focus Area:
Total Number of Handlers: Total Number of Activity Locations:	1	1				
* End of Report *						

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC In Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposure ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is an EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:41 PM

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Description of codes used on the report:

ACCESSIBILITY • indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankruptcy Indicator):	
Code	Description
B	Indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	Indicates that a RCRA responsibilities for permitting/closure, corrective action and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	Indicates that all responsible parties (owners/operators) for the handler have left the country or are otherwise not available for prosecution.
L	Indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER • indicates that the handler has been identified through a source other than Notification and is suspended of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	Indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	Indicates that the handler is a former non-notifier.
X	Indicates that the handler is a non-notifier.

Violation Type	Type Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECT ON-SITE
NRR	NON-FINANCIAL RECORD REVIEW

Enforcement Type	Description
120	WRITTEN, INFORMAL
20	INITIAL 3008(A) COMPLIANCE
30	FINAL 3008(A) COMPLIANCE ORDER

* Note: Penalty amount may not reflect all violations cited



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

W3D048613590

INSTALLATION ADDRESS

COLONIAL PIPELINE CO
PO BOX 727
WOODBURY

NJ 08096

HUNTER GROVE RD
WOODBURY

NJ 08096

10/09/80

Stinson
V.A. YAHUGROUCH
President

COLONIAL PIPELINE COMPANY OF AMERICA
Colonial Pipeline Company of America, Inc.
Colonial Pipeline Company of America, Inc.

U.S. EPA
8310110
U.S. EPA
U.S. EPA

J.W. Cervino
T.W. Cervino
T.W. Cervino
T.W. Cervino

November 4, 1993

Environmental Protection Agency Region #2
Attn: Regional Administrator
26 Federal Plaza
New York, NY 10278

Re: Exception Reporting 40 CFR 262.42
Colonial Pipeline - Woodbury Junction EPA ID #NJD048613590

Dear Sir:

This letter is to serve as manifest exception reports for the following shipments of hazardous waste picked up at Colonial's Woodbury Junction Tank Farm in Woodbury, New Jersey.

<u>Manifest Number</u>	<u>Date</u>	<u>Disposal Facility</u>
22862	9/17/93	E.I. DuPont De Nemours & Co.
22885	9/20/93	E.I. DuPont De Nemours & Co.

Enclosed is a copy of the manifest obtained from the above referenced disposal facility.

Should you have any questions or require additional information I can be contacted at the mailing address below or (404) 841-2441.

Sincerely,

Alan F. Cervino

Alan F. Cervino
Coordinator Environmental

Enclosures

cc: T. W. Cervino with enclosures
J. N. Ebright with enclosures
D. E. Smiley with ~~enclosures~~
E. J. Weirsky with ~~enclosures~~
8310110 6-AGW 26

100%
100%

Colonial Pipeline Company

REGIONS PLAZA 945 EAST PACES FERRY ROAD ATLANTA, GA 30328-4124 404.361.1472

V.A. YARBROUGH
Director-Engineering

T.W. CERVINO

Environmental Manager

November 4, 1993

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 028
Trenton, NJ 08625-0028

Re: Exception Reporting - 40 CFR 262.42
Colonial Pipeline - Woodbury Junction EPA ID #NJD048613590

Dear Sir:

This letter is to serve as manifest exception reports for the following shipments of hazardous waste picked up at Colonial's Woodbury Junction Tank Farm in Woodbury, New Jersey.

<u>State Manifest Number</u>	<u>Date</u>	<u>Disposal Facility</u>
NJA1722863	9/17/93	E.I. DuPont De Nemours
NJA1722894	9/20/93	E.I. DuPont De Nemours

Enclosed is a copy of the manifest obtained from the above referenced disposal facility.

Should you have any questions or require additional information I can be contacted at the mailing address below or (404) 841-2441.

Sincerely,

Alan F. Geis

Alan F. Geis
Coordinator Environmental

Enclosures

cc: T. W. Cervino with enclosures
J. N. Ebright with enclosures
D. E. Smiley with enclosures
E. J. Weirsky with enclosures



3393
TIG

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 028, Trenton, NJ 08825-0028

Please type or print in block letters. (Form designed for use on site (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Number	Form Approved: 01/08/00, D.O.E. File No. F-7024
		NJ D 04 8 61 3 39 0 22 882		2. Page 1 of 1
3. Generator's Name and Mailing Address		4. State Manifest Control Number		
Colonial Pipeline Co. - Woodbury Jet. Tank Farm P. O. Box 727 Woodbury, NJ 08096		NJ A 1722863		
4. Generator's Name: 609 / 384-1560 Jim Ebright		5. State Generator's ID: Mantua Grove Road Woodbury, NJ 08096		
5. Generator's Company Name: Freshhold Cartage, Inc.		6. US EPA ID Number: NJ D 05 4 12 6 164		
7. Transporter's Company Name:		8. US EPA ID Number:		
9. Destination Facility Name and Site Address: E. I. DuPont DeNemours & Co. Chamber Works, Route #XXX 130 Deepwater, NJ 08023		10. US EPA ID Number: NJ D 0 02 3 45 73 0		
11. US DOT Description including Proper Shipping Name, Hazard Class, and ID Number: H4		12. Containers	13. Total Quantity	14. Unit Measure
a. X Waste Flammable Liquid, N.O.S., (RQ D001, D014) Flammable Liquid, UN1993 (Ignitable) 9 01		11	574.00	g
b.				
c.				
d.				
e.				
f.				
15. Additional Descriptions for Materials Listed Above				
16. Section I. Additional Waste Codes = DD18 & X722 T01				
99% R20 1% Oil				
17. Special Handling Instructions and Additional Comments: Emergency Contact - Jim Ebright DuPont Contract #OW-3393 Rel# 116 24 Hour Phone # - (609)843-8742 NJ Dept. of SRG # 27 CIC/FIREWATER				
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this assignment are fully and accurately disclosed above by listing all plant name and company names, marked and labeled, and are in full accordance with the laws by which my facility is governed according to applicable international, state and local government regulations.				
I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree that it is determined to be economically reasonable and that I have selected the best available method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.				
Printed/Typed Name		Signature		Date Day Year
JAMES N. Ebright		(James N. Ebright)		09/11/93
19. Transporter's Acknowledgment of Receipt of Materials		Signature		Date Day Year
Printed/Typed Name				
TERRY COOPER		(Terry Cooper)		10/9/93
20. Transporter's Acknowledgment of Receipt of Materials		Signature		Date Day Year
Printed/Typed Name				
21. Discrepancy Indication Space C-1-A EAST 730F Office - 20 BUCK HILL ROAD 609-580-2773				

Printed/Typed Name _____ Signature _____ Date Day Year _____
A. Donnor _____ 10/11/93



State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 028, Trenton, NJ 08625-0028

Please type or print in block letters. (Form designed for use on 8 1/2 x 11-inch 12-point typewriter.)

Check applicable boxes indicating shipping mode. (A, B, C)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No N J D 04 8 61 35 9 02 2 88 5	Manifest Document No.	2. Page 1 of 1	Check applicable boxes indicating shipping mode. (A, B, C) A. State Manifest Document Number NJA 1722894
3. Generator Facility Name and Mailing Address Colonial Pipeline Co. - Woodbury Jet. Tank Farm P. O. Box 727 Woodbury, NJ 08096					
4. Generator's Phone # 609 384-1560 Jim Ebright					
5. Transporter's Company Name Freehold Cartage, Inc.		6. US EPA ID Number NJ D 03 61 2 6 164	7. State Trans. ID S2265		
7. Transporter's Company Name Freehold Cartage, Inc.		8. US EPA ID Number NJ D 03 61 2 6 164	9. State Trans. ID 908 462-1001		
10. Generator Facility Name and Site Address E. I. DuPont DeNemours & Co. Chamber Works, Route #130 Deepwater, NJ 08023		11. US EPA ID Number NJ D 00 23 8 5 73 0	12. Transporter's Phone # 609 340-2773		
13. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) HM		14. Loadmarks 00 1 1E	15. Total Quantity 05291	16. UIC Category 0	17. Waste No D 0 0 1
a. X Waste Flammable Liquid, N.O.S., 3, UN1993 PG III (RQ 0091, 0018) (Gasoline, Kerosene)					
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Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158579016
GSA No. 0246-EPA-OT



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.
NAME OF INSTALLATION
INSTALLATION MAILING ADDRESS
LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

E	C	ITEM	COMMENTS
F			
G			
H			
I			
J			
K			
L			
M			
N			
O			
P			
Q			
R			
S			
T			
U			
V			
W			
X			
Y			
Z			

I. NAME OF INSTALLATION

COLONIAL PIPELINE CO	APPROVED	DATE RECEIVED (yr. mo. & day)
✓		800818

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX	43
✓ 3 P.O. BOX 721	

CITY OR TOWN	ST.	ZIP CODE
✓ 4 WOODBURY	NJ	08096

STREET OR ROUTE NUMBER	43
✓ 5 MANTUA GROVE RD	

CITY OR TOWN	ST.	ZIP CODE
✓ 6 WOODBURY	NJ	08096

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
✓ 2 SKITH K C OPERATING SUPER	609 843-8742

V. OWNERSHIP	
A. NAME OF INSTALLATION'S LEGAL OWNER	
✓ 8	

B. TYPE OF OWNERSHIP (Enter the appropriate letter into box)	
F - FEDERAL	<input checked="" type="checkbox"/> M
M - NON-FEDERAL	<input type="checkbox"/> L

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

A. GENERATION

B. TRANSPORTATION (complete Item VII)

C. TREAT/STORE/DISPOSE

D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))				
<input type="checkbox"/> A. AIR	<input type="checkbox"/> B. RAIL	<input type="checkbox"/> C. HIGHWAY	<input type="checkbox"/> D. WATER	<input type="checkbox"/> E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION	
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.	
<input type="checkbox"/> A. FIRST NOTIFICATION	<input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES	
Enter a brief description of the hazardous wastes generated, treated, stored, disposed of, or transported by this installation. If there are more than five wastes, attach a separate sheet.	

WNYJ0548613590A1
15 14 13

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2
25 - 36	25 - 36
7	8
23 - 28	23 - 28

1	2
25 - 36	25 - 36
8	9
23 - 28	23 - 28

1	2
25 - 36	25 - 36
9	10
23 - 28	23 - 28

1	2
25 - 36	25 - 36
10	11
23 - 28	23 - 28

1	2
25 - 36	25 - 36
11	12
23 - 28	23 - 28

1	2
25 - 36	25 - 36
12	13
23 - 28	23 - 28

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14
K 0 5 2	
25 - 36	25 - 36
19	20
21 - 26	21 - 26
23	24
25 - 36	25 - 36

13	14
25 - 36	25 - 36
20	21
23 - 28	23 - 28
25	26
27	28
29	30
25 - 36	25 - 36

13	14
25 - 36	25 - 36
21	22
23 - 28	23 - 28
25	26
27	28
29	30
25 - 36	25 - 36

13	14
25 - 36	25 - 36
22	23
23 - 28	23 - 28
25	26
27	28
29	30
25 - 36	25 - 36

13	14
25 - 36	25 - 36
23	24
25 - 36	25 - 36
27	28
29	30
25 - 36	25 - 36

13	14
25 - 36	25 - 36
24	25
25 - 36	25 - 36
27	28
29	30
25 - 36	25 - 36

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32
25 - 36	25 - 36
37	38
23 - 28	23 - 28
43	44
25 - 36	25 - 36

31	32
25 - 36	25 - 36
38	39
23 - 28	23 - 28
44	45
25 - 36	25 - 36

31	32
25 - 36	25 - 36
39	40
23 - 28	23 - 28
45	46
25 - 36	25 - 36

31	32
25 - 36	25 - 36
40	41
23 - 28	23 - 28
46	47
25 - 36	25 - 36

31	32
25 - 36	25 - 36
41	42
23 - 28	23 - 28
47	48
25 - 36	25 - 36

31	32
25 - 36	25 - 36
42	43
23 - 28	23 - 28
48	49
25 - 36	25 - 36

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50
23 - 28	23 - 28

50	51
23 - 28	23 - 28

51	52
23 - 28	23 - 28

52	53
23 - 28	23 - 28

53	54
23 - 28	23 - 28

54	
23 - 28	

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

1. IGNITABLE
(DDDF)

2. CORROSIVE
(DDDE)

3. REACTIVE
(DDDS)

4. TOXIC
(DDDC)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (TYPE OR PRINT)

J. S. Sorrow, Senior Administrator
Regulatory & Environmental Affairs

DATE SIGNED

8/15/80

Colonial Pipeline Company

LENIX TOWERS, 3400 PEACHtree ROAD NE, ATLANTA, GA 30326 (404) 261-2431
FAX: (404) 261-1111

V A YAPROHOUON
Deputy Manager

T W CERVINO
Associate Supervisor

February 1, 1990

USEPA - REGION II
Permits Administration Branch
26 Federal Plaza, Room 505
New York, New York 10278

Re: Notification of Hazardous Waste Activity
Generation of PCBs - New Jersey Regulated Waste

Dear Sir:

Enclosed you will find completed Notification of Hazardous Waste Activity forms for the following Colonial Pipeline facilities in New Jersey:

Woodbury Junction - Existing EPA ID# NJD048613590
Linden Junction - Existing EPA ID# NJD068679/60
Allentown Station

Colonial has contracted Westinghouse Electric Corporation to retrofill PCB-contaminated transformers at the above facilities, February 1990. Since New Jersey classifies PCBs as hazardous waste and requires site-specific EPA ID numbers for hazardous waste generating facilities, Colonial requests that you issue an ID number for Allentown Station.

Should you have any questions or require additional information, I can be reached at the address on the letterhead or at 404/841-2431.

Sincerely,

Tim H Davidson

Tim H. Davidson
Associate Engineer

pl

Enclosures

cc: Mr. T. W. Cervino
Mr. J. W. Kilgore
Mr. A. M. Taylor

**United States Environmental Protection Agency
Washington, DC 20460**

e-EPA

Notification of Hazardous Waste Activity

For Official Use Only

Comments

Comments				
Installation's EPA ID Number NJ D 048613590		Approved	Date Received (yr. mo. day) 80 08 18	
I. Name of Installation Colonial Pipeline Company - Woodbury Junction				
II. Installation Mailing Address				
Street or P.O. Box P O BOX 727		City or Town WOODBURY		
		State NJ	ZIP Code 08096	
III. Location of Installation				
Street or Route Number MANTUA GROVE ROAD		City or Town WOODBURY		
		State NJ	ZIP Code 08096	
IV. Installation Contact				
Name and Title (last, first, and job title) MARRIS RONNIE TECHNICIAN		Phone Number (area code and number) 6098457540		
V. Ownership				
A. Name of Installation's Legal Owner COLONIAL PIPELINE CO		B. Type of Ownership (enter code) P		
VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)				
A. Hazardous Waste Activity		B. Used Oil Fuel Activities		
<input checked="" type="checkbox"/> 1a. Generator <input type="checkbox"/> 1b. Less than 1,000 kg/mo. <input type="checkbox"/> 2. Transporter <input type="checkbox"/> 3. Treater/Storer/Disposer <input type="checkbox"/> 4. Underground Injection <input type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)		<input type="checkbox"/> 6. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner <input type="checkbox"/> 7. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification		
<input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner				
VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See Instructions for definitions of combustion devices.)				
<input type="checkbox"/> A. Utility Boiler <input type="checkbox"/> B. Industrial Boiler <input type="checkbox"/> C. Industrial Furnace				
VIII. Mode of Transportation (transporters only - enter 'X' in the appropriate box(es))				
<input type="checkbox"/> A. Air <input type="checkbox"/> B. Rail <input type="checkbox"/> C. Highway <input type="checkbox"/> D. Water <input type="checkbox"/> E. Other (specify)				
IX. First or Subsequent Notification				
Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.				
<input type="checkbox"/> A. First Notification <input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)		C. Installation's EPA ID Number NJ D 048613590		

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- A. First Notification B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

NJD048613590

C															T/A C	C
w																1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
X 002					
7	8	9	10	11	12
X 722					

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number 40 CFR Part 261.33 for each chemical substance your installation handles which may be hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24)

1. Ignitable (D001) 2. Corrosive (D002) 3. Reactive (D003) 4. Toxic (D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Timothy H Davidson

Name and Official Title (type or print)

Associate Engineer

Date Signed

2/1/90

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD048613590	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 06/24/2014		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 7 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:	cme_foia.rdf
Developed by:	EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed:	June 2006
Last Updated:	May 2012
Contact:	rcrainfo.help@epa.gov
Tables Used:	cmercomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries:	none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

Page 2

COLONIAL PIPELINE CO-WOODBURY JUNCTION

Location: 696 MANTUA GRV RD, WEST DEPTFORD TWP, NJ 08066

Mailing: 696 MANTUA GRV RD, WEST DEPTFORD TWP, NJ 08066

Activity Location: NJ State District: SOUTHERN

Generator: CEG Transporter: N

Short-Term Gen: N Transfer Facility: N

Converder: N

State TSDF: N

CA Wkld: N

Active State Gen: N

Violation Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 01/25/2002

CDE Evaluation 01/25/2002 Activity Location: NJ By: State

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 10/28/1994

CSE Evaluation 01/25/1995 Activity Location: NJ

Citizen Component: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 11/09/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 09/28/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 310

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 210

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Action Date: 09/28/1994

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

County Name / Code: GLOUCESTER / NJ016

NJD048613590

REGION 02

Activity Location: NJ State District: SOUTHERN

Generator: CEG Transporter: N

Short-Term Gen: N Transfer Facility: N

Converder: N

State TSDF: N

CA Wkld: N

Active State Gen: N

Violation Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 01/25/2002

CDE Evaluation 01/25/2002 Activity Location: NJ By: State

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 10/28/1994

CSE Evaluation 01/25/1995 Activity Location: NJ

Citizen Component: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 11/09/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 09/28/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 310

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 210

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Action Date: 09/28/1994

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

* Note: Penalty amount may not reflect all violations cited.

Activity Location: NJ State District: SOUTHERN

Generator: CEG Transporter: N

Short-Term Gen: N Transfer Facility: N

Converder: N

State TSDF: N

CA Wkld: N

Active State Gen: N

Violation Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 01/25/2002

CDE Evaluation 01/25/2002 Activity Location: NJ By: State

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Activity Location: NJ Type: 262.A

Scheduled Compliance Date: 10/28/1994

CSE Evaluation 01/25/1995 Activity Location: NJ

Citizen Component: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 11/09/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

CSE Evaluation 09/28/1994 Activity Location: NJ

Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 310

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 210

Agency: State

Disposition Status:

Final Monetary: \$2,000

Penalty Information: Proposed:

Enforcement: Activity Location: NJ

Docket: CA Component: N Disposition Status:

Type: 120

Agency: State

Disposition Status:

Action Date: 09/28/1994

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

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Appeal Resolved:

Action Date: 02/03/1995

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Action Date: 03/03/1995

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Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 03/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

Action Date: 02/03/1995

Responsible Person: NJRTG

Appeal Initiated:

Appeal Resolved:

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

COLONIAL PIPELINE CO-WOODBURY JUNCTION, NJD#48613590, WEST DEPTFORD TWP, NJ, continued

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

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COLONIAL PIPELINE CO-WOODBURY JUNCTION, NJD048613590, WEST DEPTFORD TWP, NJ, continued -

Violation	NJ	Type	262-A	Determined Date:	06/18/991	Determined by Agency:	State	Responsible Agency:	State	Sequence Number:	1
Scheduled Compliance Date:	06/05/1991	Actual Compliance Date:	04/01/1993	By:	State	RTC Qualifier:	NOT RESOLVABLE	Branch:		Found Violation:	YES
CEI Evaluation	05/15/1991	Activity Location:	NJ	Identifier:	001	Person:	R2DEP	Branch:		Focus Area:	
Citizen Complaint:	NO	Multimedia Inspection:	NO	Not Subtitle C:	NO	Day Zero:					
Enforcement:	Activity Location:	NJ	Type:	120	Action Date:	05/14/1991	Identifier:	001	Appeal Initiated:	Branch:	
Docket:		Agency:	State	Responsible Person:	R2DEP	Branch:					
CA Component:	N	Disposition Status:		Appeal Initiated:							
Evaluations With No Violations:											
CEI Evaluation	04/03/2007	Activity Location:	NJ	By:	State	Identifier:	001	Person:	SQIS	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:	04/03/2007	Found Violation:	NO
CEI Evaluation	02/26/2004	Activity Location:	NJ	By:	State	Identifier:	001	Person:	SOTWO	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Found Violation:	NO
SNN Evaluation	07/18/2002	Activity Location:	NJ	By:	State	Identifier:	001	Person:	SOMPG	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Found Violation:	NO
CSE Evaluation	05/17/2002	Activity Location:	NJ	By:	State	Identifier:	001	Person:	SOMPG	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Found Violation:	NO
CDI Evaluation	12/11/2001	Activity Location:	NJ	By:	State	Identifier:	001	Person:	SOMPG	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Found Violation:	NO
CDI Evaluation	10/20/1999	Activity Location:	NJ	By:	State	Identifier:	002	Person:	NISM	Branch:	S
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:		Found Violation:	NO
Focus Area:											
Total Number of Handlers:											
Total Number of Activity Locations:											
* End of Report *											

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEQ), or not a generator (N).
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ("Y" indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a "Treatment", Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment).
IC In Place	Indicates that the facility has Institutional Controls in place. ("Y" indicates that the facility is in this universe).
EI Indicator (HE / GM)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ("Y" indicates the exposure exists and is under control; "N" indicates the exposure does not exist) GW - Groundwater Release ("+" indicates the exposure exists and is under control; "N" indicates the exposure exists and is not under control)
Short-Term Gen Transfer Facility	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes. Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ("Y" indicates that the facility is in this universe).
Active State Gen Converter	Indicates that the facility is an Active State Generator. ("Y" indicates that the facility is in this universe).
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land and Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier with a Compliance Schedule ("Y" indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule ("Y" indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier ("Y" indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule ("Y" indicates that the facility is in this universe); * Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

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Description of codes used on the report:

ACCESSIBILITY - Indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
232.A	GENERATORS - GENERAL
262.B	GENERATORS - MANIFEST

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
SN	NOT A SIGNIFICANT NON-COMPLIER

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:44 PM

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Description of codes used on the report:

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

* Note: Penalty amount may not reflect all violations cited.

RCRA Site Detail

Report run on: June 23, 2014 - 11:30 AM

Version 5.0

User Selection Criteria

Handler EPA ID: NJD986643799

History: All records

BR Cycles: Show all

Include Notes: No

Results

Data meeting the criteria you selected follows.

Total Pages: 5

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by latest historical information and most recent BR cycle.

Data is sorted by the most recent Received Date. If more than one record has the same Received Date, the data is sorted by Source Type (I-Implementer, N-Notification, B-Biennial Report with Subsequent Notification, R-Biennial Report, A-Part A, T-Temporary, E-Emergency).

Report Information

Name: h_site_detail.rdf
Developed by: EPA Headquarters, Office of Resource Conservation and Recovery
Deployed: November 2002
Last Revised: September 2012
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_unlv5, gls4, gls_lat_long4, lu_generator_status, hother_id5, hpart_a5, hhandler5, lu_generator_status, lu_country, howner_operators5, hnaios5, lu_naics, hstate_activity5, lu_state_activity, hother_permit5, lu_other_permit, huniversal_waste5, lu_universal_waste, hwaste, code5, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bgm_waste_code, lu_management_method, lu_state, hid_groups, hhsm_basic5, hhsm_activity5, hhsm_waste_code5

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: June 23, 2014 - 11:30 AM

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List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Active	Active Status -- Indicates that the facility could be subject to the federal RCRA, Subtitle C or a state's authorized hazardous waste program. This definition has no legally enforceable or binding determination about the status of a particular site or the obligations of an owner or operator.
Commercial TSDF	Commercial TSDF -- Indicates that the facility is a commercial operator of treating, storing and disposing of hazardous waste.
EI Indicator (HE/GW)	Environmental Indicator (Human Exposure/Groundwater Release) -- Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; 'U' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist). GW - Groundwater Release ('+' indicates the exposure exists and is under control; 'U' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist).
Federal Generator	Federal Generator Status -- Indicates the regulatory status of the site as determined by the quantity and/or toxicity of hazardous wastes generated, stored or accumulated over a specified period of time.
HSM	HSM -- Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
IC In Place	Institutional Controls in Place -- Indicates that the facility has Institutional Controls in place ('Y' indicates that the facility is in the universe).
Importer	Importer -- Indicates that the facility imports hazardous waste into the United States from a foreign country.
Mixed Waste Generator	Mixed Waste Generator -- Indicates that the facility is a generator or TSDF that handles waste mixed with nuclear source, special nuclear or by-product material.
Operating TSDF	Operating TSDF -- Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment).
Short Term Generator	Short Term Generator -- Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
State Generator	State Generator Status -- Indicates the regulatory status of the site in view of implementing the State's "broader in scope" or "more stringent than" rules. Although an implementing State might use terms that differ for their generators these terms would be translated to match the Federal regulatory term.
Transporter	Transporter -- Indicates that the facility is engaged in the off-site transportation of hazardous waste. ('Y' indicates that the facility is in this universe).
Subpart K/College	Subpart K/College or University -- Indicates facility has opted into the subpart k laboratory rule as a college or university.
Subpart K/Hospital	Subpart K/Teaching Hospital -- Indicates facility has opted into the subpart k laboratory rule as a teaching hospital.
Subpart K/Non-profit	Subpart K/Non-profit Research Institute -- Indicates facility has opted into the subpart k laboratory rule as a non-profit research institute.
Subpart K/Withdrawal	Subpart K/Withdrawal from Rule -- Indicates facility has withdrawn from the subpart k laboratory rule

RCRA Site Detail

Report run on: June 23, 2014 - 11:30 AM

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

I C I CHEMICAL INC**NJD986643799**

EPA Region:02 Extract:Y County: GLOUCESTER

State District: SOUTHERN

Universes:	Federal Generator: N	Transporter: N	Operating TSDF: —	Active: N
	State Generator: N	Importer: N	Commercial: N	EI Indicator (HE / CW): N / N
	Short Term Generator: N	Mixed Waste Generator: N	HSM: N	IC In Place: N
	Subpart K/College: N	Subpart K/Hospital: N	Subpart K/Non-profit: N	Subpart K/Withdrawal: N

Latitude/Longitude Measure - Owner: Seq #:

Coordinates:

Receive Date: 01/01/2007 Source Type: Implementer Seq. Number: 2

Location: 286 MANTUA GROVE RD
Address: WEST DEPTFORD, NJ 08066-1732Mailing Address: 286 MANTUA GROVE RD
WEST DEPTFORD, NJ 08066 1732
UNITED STATESContact Person RAYMOND NOTARO 286 MANTUA GROVE RD
For Source (609) 423-8560 WEST DEPTFORD, NJ 08066-1732
Information UNITED STATES

Owner (current) I C I CHEMICALS INC From: To:	C-O I C I AMERICAS INC WILMINGTON, DE 19897 WILMINGTON	Type: Private Phone: (302) 886-3000
---	--	--

Operator (current) I C I CHEMICALS INC From: To:	C-O I C I AMERICAS INC WILMINGTON, DE 19897 WILMINGTON	Type: Private Phone: (302) 886-3000
--	--	--

Land Type: Private Non Notifier: No TSD Date: Accessibility:

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: NJ-N Not a generator, Verified

Other Hazardous Waste Generator Activities

Used Oil Activities				
Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	No	Transporter:	No	Used Oil Fuel Marketer Activity
Mixed Waste Generator:	No	Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity	No	No
Transfer Facility:	No		No	Marketer who first claims the used oil meets the specifications:
TSD Activity:	No	Processor:	No	No
Recycler Activity:	No	Refiner:	No	
Off-Site Receipt:	No		No	
Exempt Boiler and/or Industrial Furnace		Subpart K		
Small Quantity Onsite Burner Exemption: Smelting, Melting, Refining Furnace	No	College/University:	No	No
Exemption:	No	Teaching Hospital:	No	No
Underground Injection Control:	No			
Destination Facility for Universal Waste:	No			

RCRA Site Detail

Report run on: June 23, 2014 - 11:30 AM

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***** WARNING *** Sensitive information may be displayed on this report. *** WARNING *****

Receive Date:	01/01/2006	Source Type:	Implementer	Seq. Number:	1
Location:	286 MANTUA GROVE RD		Mailing Address:	286 MANTUA GROVE RD WEST DEPTFORD, NJ 08066-1732 UNITED STATES	
Contact Person For Source Information:	RAYMOND - NOTARO (609) 423-8560	286 MANTUA GROVE RD WEST DEPTFORD, NJ 08066-1732 UNITED STATES			
Land Type:	Private	Non Notifier:	No	TSD Date:	Accessibility:
Regulated Waste Activities					
Hazardous Waste Generator Status - Federal: Not a Generator; State: NJ-N Not a generator, Verified					
Other Hazardous Waste Generator Activities					
Used Oil Activities					
Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No	
Importer Activity:	No	Transporter:	No	Used Oil Fuel Marketer Activity	
Mixed Waste Generator:	No	Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity	No	No	
Transfer Facility:	No	Processor:	No	Marketer who first claims the used oil meets the specifications:	
TSD Activity:	No	Refiner:	No	No	
Recycler Activity:	No	Subpart K	College/University:	Non-profit Research Institute:	No
Off-Site Receipt:	No	Teaching Hospital:	No	Withdrawal:	No
Exempt Boiler and/or Industrial Furnace					
Small Quantity Onsite Burner Exemption: Smelting, Melting, Refining Furnace Exemption:	No				
Underground Injection Control:	No	Subpart K	College/University:	Non-profit Research Institute:	No
Destination Facility for Universal Waste:	No	Teaching Hospital:	No	Withdrawal:	No

RCRA Site Detail

Report run on: June 23, 2014 - 11:39 AM

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*** WARNING *** Sensitive information may be displayed on this report. *** WARNING ***

Receive Date: 12/07/1992	Source Type: Notification	Seq. Number: 1			
Location: 286 MANTUA GROVE RD Address: WEST DEPTFORD, NJ 08066-1732		Mailng Address: 286 MANTUA GROVE RD WEST DEPTFORD, NJ 08066-1732			
Contact Person For Source Information	RAYMOND NOTARO (609) 423-8560	286 MANTUA GROVE RD WEST DEPTFORD, NJ 08066-1732 UNITED STATES			
Owner (current) I C I CHEMICALS INC	C-O-I C I AMERICAS INC WILMINGTON, DE 19897	Type: Private Phone: (302) 886-3000			
From:	To:				
Land Type: Private	Non Notifier: No	TSD Date:			
Accessibility:					
Regulated Waste Activities					
Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator					
Other Hazardous Waste Generator Activities					
Used Oil Activities					
Short Term Generator: Importer Activity: Mixed Waste Generator:	No No No	Used Oil Transporter Activity Transporter: Transfer Facility:	No No	Off-Specification Used Oil Burner: Used Oil Fuel Marketer Activity	No
Transporter Activity: Transfer Facility: TSD Activity: Recycler Activity: Off-Site Receipt:	No No No No No	Used Oil Processor and/or Re-refiner Activity Processor: Refiner:	No No	Marketer who directs shipment off specification used oil to off-specification used oil burner: Marketer who first claims the used oil meets the specifications:	No
Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: Smelting, Melting, Refining Furnace Exemption:	No No	Subpart K College/University: Teaching Hospital:	No No	Non-profit Research Institute: Withdrawal:	No No
Underground Injection Control.					
Destination Facility for Universal Waste:					

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D000 D001 D002 D003 D005 D006 D008 D009 F002 F003 F005 U009 U162 U223 X001

* End of Report *



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• NJD93070357

JOHNSON MATTHEY CHEMICAL DIVISION
3001 NOLTE DRIVE
WEST DEPTFORD

NJ 08065

INSTALLATION ADDRESS

3001 NOLITE DRIVE
WEST DEPTFORD

NJ 08065

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE.

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

ATTACHMENT

FOR OFFICIAL USE ONLY

COMMENTS

C N D 18075536

15 16 INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr. mo. & day)

E N D 18075536 7 1 8 30 50 5

15 17 18

I. NAME OF INSTALLATION

JOHNSON MATT HEY CHEMICAL DIVISION

30 31

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 2001 NOLTE DRIVE

15 18

CITY OR TOWN ST. ZIP CODE

4 WEST DEPT FORD NJ 08066

15 16 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

ENVIRONMENTAL PROTECTION AGENCY
NEW YORK OFFICE
ATTACHMENT

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 SAME

15 16

CITY OR TOWN ST. ZIP CODE

6 SAME

15 16 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

GLOUCESTER 015

15 16

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 REYNOLDS CHRISTOPHER SUPERVISOR 609 853 8000

15 16 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

PHONE NO. (area code & no.)

2 REYNOLDS CHRISTOPHER SUPERVISOR 609 853 8000

15 16 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 JOHNSON MATT HEY INC

15 16

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL M - NON-FEDERAL

M

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

X A. GENERATION

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

C. TREAT/STORE/DISPOSE

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

D. TRANSPORTATION (complete item VII)

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

E. UNDERGROUND INJECTION

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

VII. MODE OF TRANSPORTATION (transporters only -- enter "X" in the appropriate box(es))

A. AIR B. RAIL C. HIGHWAY D. WATER E. OTHER (specify):

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification or a subsequent notification.

If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

C. INSTALLATION'S EPA I.D. NO.

40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

FORM 1585-079016 (Rev. 10-80)

APPLICABLE ON REVERSE

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
W														

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
7	8	9	10	11	12	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
19	20	21	22	23	24	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
28	26	27	28	29	30	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
37	38	39	40	41	42	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	
43	44	45	46	47	48	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

1. IGNITABLE
(D001)

2. CORROSIVE
(D002)

3. REACTIVE
(D003)

4. TOXIC
(D004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

Robert M. DeCicco, Operations

DATE SIGNED

4/28/83

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYENVIRONMENTAL PROTECTION
AGENCY, REGION II
NEW YORK, N.Y.

1556 APR -8 PM 3:57

PLEASE PLACE STANDEE IN THIS SPACE
BRANCHINSTALLA-
TION'S EPA
I.D. NO.NAME OF IN-
STALLATIONINSTALLA-
TION
MAILING
ADDRESSLOCATION
OF INSTAL-
LATION

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

C N J D 9 8 0 7 5 6 3 6 7

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED

(yr., mo. & day)

J. NAME OF INSTALLATION

JOHNSON MATTHEY INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 2 0 0 1 NOLTE DRIVE

CITY OR TOWN

ST. ZIP CODE

4 WEST DEPTFORD

N.J. 08066

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 2 0 0 1 NOLTE DRIVE

CITY OR TOWN

ST. ZIP CODE

6 WEST DEPTFORD

N.J. 08066

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 WILLIAM KEELEY JR QUALITY MGR 201-853-8000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 JOHNSON MATTHEY INC

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

A. GENERATION

B. TRANSPORTATION (complete item VII)

C. TREAT/STORE/DISPOSE

D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

A. AIR

B. RAIL

C. HIGHWAY

D. WATER

E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your Installation's first notification or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

 A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

N J D 9 8 0 7 5 5 3 6 7

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY									
*									
W									
1	2	3	4	5	6	7	8	9	10

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1
F 0 0 1
23 - 20
7
F 0 0 7
23 - 20

2
F 0 0 2
23 - 20
8
F 0 0 8
23 - 20

3
F 0 0 3
23 - 20
9
F 0 0 9
23 - 20

4
F 0 0 4
23 - 20
10
F 0 2 2
23 - 20

5
F 0 0 5
23 - 20
11
F 0 2 6
23 - 20

6
F 0 0 6
23 - 20
12
F 0 2 7
23 - 20

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13
K 0 2 8
23 - 20
19
23 - 20
25
23 - 20
26

14
K 1 0 4
23 - 20
20
23 - 20
26
23 - 20
28

15
23 - 20
21
23 - 20
26
23 - 20
27

16
23 - 20
22
23 - 20
26
23 - 20
28

17
23 - 20
23
23 - 20
26
23 - 20
29

18
23 - 20
24
23 - 20
26
23 - 20
30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31
23 - 20
37
23 - 20
38
23 - 20
43

32
23 - 20
38
23 - 20
44
23 - 20
45

33
23 - 20
39
23 - 20
45
23 - 20
46

34
23 - 20
40
23 - 20
46
23 - 20
47

35
23 - 20
41
23 - 20
42
23 - 20
48

36
23 - 20
49
23 - 20
50
23 - 20
51
23 - 20
52
23 - 20
53
23 - 20
54

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49

50

51

52

53

54

1. IGNITABLE
(D001)

2. CORROSIVE
(D002)

3. REACTIVE
(D003)

4. TOXIC
(D004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (Type or print)

REFINING SERVICES DIVISION MANAGER

DATE SIGNED

4/1/85

Bellina/Bogard
Smoketion



Johnson⁹Matthey³⁷

EPA
ID No.

August 21, 1991

Mr. Constantine Sidamon-Eristoff
Regional Administrator
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Re: Exemption from Boiler and Industrial Furnace Regulations

Dear Administrator Sidamon-Eristoff:

The Johnson Matthey Inc., Materials Technology Division operates a specialty chemicals manufacturing facility in West Deptford, New Jersey. An integral part of this facility is the operation of a precious metals recovery facility, which incorporates use of furnaces and afterburners to recover the precious metal from our own and our customer's material.

This facility has an EPA ID No. NJD 980755367, and is exempt from hazardous waste facility permit requirements under existing federal and New Jersey hazardous waste regulations codified as N.J.A.C. 7:26-12.1 (e). The facility currently has air pollution certificates to operate issued by the New Jersey Department of Environmental Protection (NJDEP) pursuant to N.J.A.C. 7:27-B.

Because the nature of this operation is to recover materials by combustion, we examined the U.S. EPA regulations governing the combustion of hazardous waste in boilers and industrial furnaces (BIF) adopted February 21, 1991 (56 FR 7134, et seq) to determine their applicability to our facility. Based upon this review, we conclude that we are an existing facility, as defined in 40 CFR 266.103, because we have been processing these materials prior to August 21, 1991. We do not believe that this rulemaking changes our current exemption from hazardous waste permitting.

In addition, we believe that we are exempt from the BIF regulations as a result of our precious metal reclamation activity. The exemption was implicit in the hazardous waste regulations at the federal and state level, but at the request of the International Precious Metals Institute, a trade organization, the U.S. EPA has issued a technical amendment clarifying the BIF rule, signed by the EPA administrator on August 16, 1991. A copy of the relevant pages of this exempting amendment are attached. It is anticipated that the Federal Register notice will occur within a week or so.

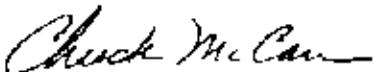
Based upon our review of this amendment, and a discussion between Mr. John Brogard of your Hazardous Waste Facilities Branch and Mr. Richard Craig of Roy F. Weston, we are confident we are exempt from the BIF regulations. The only remaining issue is the status under the one-time reporting notice requirement under BIF, due to be filed on August 21, 1991. In order to prevent any future confusion, please accept this letter as confirmation that the Johnson Matthey facility in West Deptford, New Jersey is notifying the U.S. EPA and the NJDEP that we are indeed exempt from the Boiler and Industrial Furnace Regulations as adopted February 21, 1991 and amended August 16, 1991.

Per 40 CFR 266.100(f), the Johnson Matthey facility in West Deptford, New Jersey:

- 1) Claims exemption under this paragraph,
- 2) Certifies that hazardous waste is burned for legitimate recovery of precious metal; and
- 3) Certifies that the facility will comply with the sampling, analysis and recordkeeping requirements of this paragraph

Should you have any questions regarding this matter, please feel free to contact me at (609) 384-7091.

Very truly yours,



Chuck McCann
Manager - Safety, Health and Environment

encl

cc: F. J. Opet
R. M. DeCicco
R. R. Trout
J. Brogard, U.S. EPA
T. Sherman, NJDEP
R. Craig, Roy F. Weston

8/19/91

linotyping), and spent jumper cables -- which the Agency is also including. CEPA notes, however, that all of these materials must actually contain recoverable amounts of lead to be deemed burned for metal recovery. See new §266.100(c)(3).) Similarly, we have included in Appendix XII a list of nickel or chromium-bearing materials that are legitimately recycled for metal value by nickel-chromium recovery furnaces that are not generated by manufacturers or users of nickel, chromium, or iron (e.g., electroplating wastewater treatment sludges, and nickel-cadmium and nickel-iron batteries).

In addition, we note that several lead-bearing materials that have been historically processed in lead recovery furnaces have not been included on the Appendix XI list: by-product drosses, slurry and slurry screenings, slags, and scrap lead. We did not include these materials because they are either not solid wastes when recycled or are exempt from regulation when recycled. See §§261.2(c)(3) and 261.6(a)(3)(iv).

Finally, we note that the Agency may determine that a material on Appendices XI or XII burned at a particular metal recovery furnace may have levels of toxic organic constituents substantially higher than a total of 500 ppm. (The Agency could make this determination because owners and operators claiming the exemption must notify the Agency. The Agency may then obtain waste analytic data or other information from the facility record or from EPA sampling that indicates the presence of high levels of toxic organic constituents.) The amended rule enables the Agency to determine on a case-by-case basis that the material may pose a hazard to human health and the environment when burned in a metal recovery furnace due to presence of toxic organic constituents at levels exceeding a total of 500 ppm, and to order that the burning either cease or be conducted in compliance with the BIF rule. The Agency is adopting this extra safeguard even though the rule already provides that, to be exempt from the <5,000 Btu/lb and <500 ppm toxic organics tests, the material cannot be listed for a toxic organic constituent or fail the Toxicity Characteristic (TC) for a toxic organic constituent. The waste might still contain high levels of toxic organic constituents that are not included in the TC or the material's matrix may not readily leach toxic organic constituents during the TC extraction procedure but would be liberated during burning in the furnace. In making the determination, EPA would consider the concentration and toxicity of toxic organic constituents in the material, the level of destruction of toxic organic constituents provided by the furnace, and whether the acceptable ambient levels established in Appendices IV and V of Part 266 may be exceeded for any toxic organic compound that may be emitted (i.e., including products of incomplete combustion) based on dispersion modeling to predict the maximum annual average off-site (unless a person resides on-site) ground level concentration.

Should the Director determine that burning particular wastes with organic contaminants in a metal recovery furnace poses a hazard to human health and the environment, as explained above, the Agency would issue a notice to the company burning the waste indicating the basis for this tentative determination. The company would have an opportunity to respond to the determination but could not burn the waste in the interim. The Director would then make a final determination and document the basis for his conclusion. If the conclusion is that the waste would pose a hazard, then further burning would be illegal unless performed in compliance with the BIF rules. (It also may be possible to pretreat the waste to remove or destroy organics, and then burn it safely.) The determination would only apply to subsequent burning, however. There would be no enforcement penalties for burning occurring before the Director's tentative determination.

10. Precious Metal Recovery Furnaces Engaged in Legitimate Metal Recovery Are Not Regulated by the BIF Rule. EPA has been asked about the regulatory status of precious metal recovery operations under the BIF rules. Such operations are generally exempt from subtitle C regulation (with the exception of certain

8/1991

tracking and recordkeeping requirements). See 40 CFR Part 266, Subpart F and 50 FR at 648 (Jan. 4, 1985). This is because the value of precious metal in the wastes provides a strong incentive for proper handling. *Id.* (In addition, land disposal of the wastes is prohibited under Part 268.)

EPA interprets this exemption as continuing to apply so that industrial furnaces¹³ engaged in legitimate precious metal recovery operations are not subject to regulation under the BIF rule. Not only does the text of §266.70 support this result, but the rationale for the exemption still holds. The value of the precious metals ensures proper handling not only before recycling, but during the recycling process. Recovery of particulate matter from air emissions is in fact typically maximized in the metal recovery process due to the value of these metals. EPA also notes that the technical provisions of the BIF rule may not be applicable to the precious metal recovery process. Initial thermal oxidation of materials normally must be done slowly at relatively low temperatures in order not to drive the precious metals off in flue gas. Combustion at the 1800 °F temperature specified in the rule for interim status facilities (see §266.103(a)(5) for furnaces that feed hazardous waste at locations other than the "hot end") would be self-defeating. (Precious metal furnaces are, however, typically equipped with afterburners and secondary combustion chambers to destroy any pyrolyzed organics and to assist in further recovering precious metals.)

In order to clarify that the exemption in Part 266, Subpart F, continues to apply, EPA is adding a conforming amendment to §266.100(f) (applicability of BIF rule) to indicate that legitimate precious metal recovery operations are not subject to the rule. The Agency indicated in the January 4, 1985 solid waste definition regulations some of the indicia of legitimate precious metal recovery operations. See 50 FR at 648-49. These include presence of economically significant amounts of precious metals, efficient recovery operations, no land disposal of wastes destined for recovery, and payment by the reclainer to the waste's generator. Industry members indicate further that materials destined for precious metal reclamation are normally batch segregated into distinct and identified batches of like material, that generators and recovery facilities normally enter into written contracts before materials are transferred specifying compensation to the generator and when transfer is to occur, and that true precious metal recovery is characterized by net financial return to the generator (i.e., a price sufficient to cover all charges for transport, storage, and processing).¹⁴ Presence of air pollution control equipment to recover any precious metals contained in emissions would be a further indication of a legitimate operation. Conversely, the absence of one or more of these features could serve as potential indications of a sham recycling operation, which would, of course, be subject not only to the BIF rules but to all other subtitle C provisions as well. See 50 FR at 649. Furthermore, under §261.2(f), persons ostensibly engaged in precious metal reclamation of hazardous wastes have the burden of proving (normally through recordkeeping plus presence of appropriate recovery equipment) that they are engaged in legitimate recovery activities. We have added a recordkeeping requirement to §266.100(f)(3) to ensure existence of proper documentation.

11. Records Must Be Kept Until Closure. In the final rule published on February 21, 1991, EPA inadvertently provided conflicting requirements for the length of time that monitoring, testing, and other information that must be included in the operating

¹³ That is, smelting, melting, and refining furnaces including pyrometallurgical devices such as cupolas, sintering machines, roasters, and foundry furnaces.

¹⁴ See correspondence from John C. Bullock, Heady & Harman, to J. Robert Holloway, EPA, July 16, 1991; and correspondence from John C. Bullock, Esq. to Steven Silverman, July 19, 1991 and attachments.

40 CFR 266.100 Applicability

(C) Whether the acceptable ambient levels established in appendices IV or V of this part may be exceeded for any toxic organic compound that may be emitted based on dispersion modeling to predict the maximum annual average off-site ground level concentration.

* * * *

266.100(f) Owners and operators of smelting, melting, and refining furnaces (including pyrometallurgical devices such as cupolas, sintering machines, roasters, and foundry furnaces) that process hazardous waste for recovery of economically significant amounts of the precious metals gold, silver, platinum, palladium, iridium, osmium, rhodium, or ruthenium, or any combination of these are conditionally exempt from regulation under this subpart, except for §266.112. To be exempt from §§266.101 through 266.111, an owner or operator must:

- (1) Provide a one-time written notice to the Director indicating the following:
 - (i) The owner or operator claims exemption under this paragraph;
 - (ii) The hazardous waste is burned for legitimate recovery of precious metal; and
 - (iii) The owner or operator will comply with the sampling and analysis and recordkeeping requirements of this paragraph; and

- (2) Sample and analyze the hazardous waste as necessary to document that the waste is burned for recovery of economically significant amounts of precious metal using procedures specified by Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, incorporated by reference in §260.11 of this chapter or alternative methods that meet or exceed the SW-846 method performance capabilities. If SW-846 does not prescribe a method for a particular determination, the owner or operator shall use the best available method; and

- (3) Maintain at the facility for at least three years records to document that all hazardous wastes burned are burned for recovery of economically significant amounts of precious metal.

3. Section 266.102 is amended by revising the first two sentences of subparagraph (b)(1) and revising subparagraph (c)(10) to read as follows:

§266.102 Permit standards for burners.

* * * *

(b) *Hazardous waste analysis.* (1) The owner or operator must provide an analysis of the hazardous waste that quantifies the concentration of any constituent identified in appendix VIII of part 261 of this chapter that may reasonably be expected to be in the waste. Such constituents must be identified and quantified if present, at levels detectable by analytical procedures prescribed by Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (incorporated by reference, see §260.11 of this chapter). Alternative methods that meet or exceed the method performance capabilities of SW-846 methods may be used. If SW-846 does not prescribe a method for a particular determination, the owner or operator shall use the best available method. * * *

* * * *

April 23, 1992, Inspection of Johnson Matthey Mat. Tech.

On April 23, 1992, John Wilk (2AWM-HWC) conducted an inspection of Johnson Matthey Materials Technology Division, located at 2001 Nolte Drive, West Deptford, NJ. The purpose of the inspection was to determine if the facility was eligible for the BIF precious metals recovery exemption under 40 CFR § 266.100 (f) and, if so, was complying with the reduced operating requirements pursuant to that section.

The BIF precious metals recovery exemption, a technical amendment which will appear in the 1992 CFR at 40 CFR § 266.100(f), allows facilities that reclaim precious metals from hazardous waste, using furnaces, to operate without complying with the strict BIF permitting and emission standards providing it complies with the following:

- (1) The facility provides a one-time written notice to EPA indicating the following:
 - (i) The facility claims the exemption;
 - (ii) The hazardous waste is burned for legitimate recovery of precious metals; and
 - (iii) The facility complies with sampling and analysis and recordkeeping requirements.
- (2) The facility samples and analyzes the hazardous waste to support the above claims.
- (3) The facility maintains records for three years.

Facility Description and Operations:

Johnson Matthey reclaims precious metals via the following process:

- 1) Precious metals bearing hazardous wastes are placed in trays and placed into one of seven gas fueled furnaces. Each furnace is vented through a common stack. A temperature of approximately 1600 degrees Fahrenheit is achieved in the primary furnace. Gas flow continues through a swirl chamber and into a secondary combustion chamber maintained at 1800-2200 degrees fahrenheit. The gas is then scrubbed in a packed column tower and emitted.
- 2) The filter fraction of the waste is destroyed leaving behind a mixture of ash and metals.
- 3) The residue is poured from the trays and mixed with acid (usually hydrochloric and nitric.)

4) The acid mixture is filtered separating the ash from the dissolved metals. The acid filtrate solution contains the metals.

5) The precious metals are separated from the acid solution using various separation techniques. Acid residues are neutralized and discharged to the municipal sewer system.

During the inspection, Johnson Matthey supplied a list of precious metals bearing hazardous waste which it receives for processing (see attachment.) The wastes which are burned in the furnaces are marked (e.g., some are reclaimed without burning.)

The facility maintained documentation that the wastes contained precious metals and verbally related that all wastes are purchased from generators or are otherwise reclaimed for a fixed price.

In accordance with the technical amendment at 40 CFR § 266.100(f), on August 21, 1991, the facility provided EPA with a one-time written notice claiming the precious metals exemption.

Conclusion and Recommendations:

The January 4, 1985 Federal Register (50 FR at 648) discussed some of the indications of legitimate precious metal recovery operations. These include the presence of economically significant amounts of precious metals in the hazardous waste, efficient recovery operations, no land disposal of wastes destined for recovery, and payment by the reclaimer to the waste generator. Most of these requirements appear to have been met by the facility.

Although the facility was burning F and D coded precious metals containing hazardous wastes, the technical amendment at 40 CFR § 266.100(f) does not specifically include maximum allowable levels of organic contaminants. A clarification will be requested from headquarters to define what constitutes "legitimate" recovery and how the interpretation specifically relates to the facility's burning of F and D wastes.

cc pMD Johnson-Mathey
JDM
DW

JM 358,769 kg
CUST 328,388 kg
BEST 419,612 kg

WASTE MANIFEST SUMMARY

02/05/92

LOGSHFT	CUSTOMER	DESCRIPTION	MANIFEST	WASTE TYPE	DR#	LOC	NEXTLOG	RECEIVED	PROCESS	DATE	BEST	PROCESS
											KG	DAVS
157860	1 MECHANICAL	AQUA REGIA SOLN S/T/	NJA1011669	DD02	0	C2066901	01/07/91	01/16/91		151	9	
157861	1 MECHANICAL	S/T/C PH SOLN (F-WAS	NJA1011669	DD01	0	V786	T9842B01	01/07/91	03/01/91	110	53	
157862	1 BIDMC W.W.	S/T/C PH SOLN (F-WAS	NJA1011669	DD03	0002	0001	0	V785	01/07/91	03/01/91	67	53
A10364	1 DUPONT BEAUMONT	FISH OIL S/T/C PM	NJA1001005	DD01	0002	52	RFFL	C2086801	01/10/91	03/13/91	10,067	62
A10369	1 ELI LILLY & COMPANY	S/T/C SPENT PD ON CA	NJA1001005	DD01	33	RFFL	C2076301	01/10/91	02/08/91	3,883	29	
A10371	1 THE NUTRASWEET COMPANY	S/T/C SPENT CATALYST	NJA1001005	DD01	21	RFFL	C2022301	01/11/91	01/29/91	1,598	18	
157877	1 DEVON AUTOCAT	RICH PAPERS S/T/C PA	NJA1011669	DD05	43	CNPY	T9848101	01/17/91	06/24/91	23	158	
157882	1 DEVON AUTOCAT	S/T/C SPENT CHLORIDE	NJA1011669	DD05	41	W10	C2087101	01/17/91	03/15/91	4,060	57	
157883	1 DEVON AUTOCAT	S/T/C SPENT CHLORIDE	NJA1011669	DD05	20	W10	C2084201	01/17/91	03/12/91	2,090	54	
157884	1 DEVON AUTOCAT	S/T/C SPENT AMINES	NJA1011669	DD02	DD05	2	W10	C2088101	01/17/91	03/20/91	218	62
157885	1 DEVON AUTOCAT	S/T/C SPENT AMINES	NJA1011669	DD02	DD05	5	W10	01/17/91	09/09/91	23	235	
157886	1 DEVON AUTOCAT	S/T/C SPENT AMINES (NJA1011669	DD02	DD05	1	W10	C2088101	01/17/91	03/20/91	115	62
157887	1 DEVON AUTOCAT	S/T/C SPENT AMINES (NJA1011669	DD02	DD05	1	W10	C2088201	01/17/91	03/21/91	95	63
157888	1 DEVON AUTOCAT	RESIDUE S/T/C PM	NJA1011669	DD05	2	RFFL	C2110501	01/17/91	05/28/91	70	131	
157889	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT AMINES	NJA1011669	DD02	14	W10	C2095801	01/27/91	04/10/91	1,276	83	
A10426	1 THE NUTRASWEET COMPANY	S/T/C SPENT CATALYST	NJA1001005	DD01	20	ISFL	C2074001	01/21/91	02/04/91	54	14	
A10458	1 TEXAS EASTMAN CO.	S/T/C SPENT RH CAT S	NJA1001005	DD01	65	IGFL	C2109101	01/23/91	04/04/91	9,412	71	
A10539	1 NUTRASWEET	S/T/C PD ON CARBON	NJA1001005	DD01	18	RFFL	C2078101	01/30/91	02/12/91	1,379	13	
A10540	1 NUTRASWEET	S/T/C PD ON CARBON	NJA1001005	DD01	6	RFFL	C208C501	01/30/91	02/18/91	581	19	
A10541	1 MALLINCKRODT INC.	S/T/C PT ON CARBON	NJA1001005	DD02	0036	13	RFFL	C2123801	01/30/91	04/12/91	186	72
A10542	1 MALLINCKRODT INC.	S/T/C PT ON CARBON	NJA1001005	DD02	DD03	23	IGFL	C2094701	01/30/91	04/05/91	3,373	65
157904	1 DEVON AUTOCAT	S/T/C SPENT SOLN CHL	NJA1011669	DD02	DD05	45	W60	C2092101	02/05/91	03/27/91	4,304	50
157905	1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1011669	DD02	DD05	28	W60	C2104201	02/05/91	04/25/91	2,284	79
157906	1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1011669	DD02	DD05	5	W60	C208B101	02/05/91	03/20/91	1,145	43
157907	1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1011669	DD02	DD05	5	W60	C2088201	02/05/91	03/21/91	478	44
157908	1 DEVON AUTOCAT	S/T/C PM RESIDUE	NJA1011669	DD05	1	W60	T9845301	02/05/91	05/28/91	35	112	
A10642	1 THE NUTRASWEET CO.	S/T/C SPENT CATALYST	NJA1001005	DD01	26	ISFL	C2084101	02/14/91	03/12/91	2,026	26	
A10643	1 NUTRASWEET	S/T/C SPENT CATALYST	NJA1001005	DD01	5	ISFL	C2084101	02/14/91	03/07/91	529	21	
157936	1 DEVON AUTOCAT	S/T/C SPENT SOLN CHL	NJA1011669	DD05	20	W20	C2105901	02/14/91	05/01/91	1,864	76	
157937	1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1011669	DD02	DD05	5	W20	C2105901	02/14/91	05/01/91	519	76
157938	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT SOLN	NJA1011669	DD02	DD05	9	W20	C2104201	02/14/91	05/01/91	848	76
157939	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT SOLN (TP	NJA1011669	DD02	DD05	7	W20	C2104201	02/14/91	05/01/91	714	76
157940	1 DEVON AUTOCAT	RESIDUE/BTMS S/T/C P	NJA1011669	DD05	8	RFFL	C2108801	02/14/91	05/22/91	114	97	
A10706	1 DUPONT-BEAUMONT	S/T/C FISH OIL	NJA1001005	DD01	52	IGFL	C2126901	02/25/91	05/17/91	9,615	81	
A10710	1 TEXAS EASTMAN CO	S/T/C SPENT CATALYST	NJA1001005	DD01	30	RFFL	C2097001	02/25/91	04/11/91	4,561	45	
A10712	1 MALLINCKRODT	S/T/C PT ON C	NJA1001005	DD02	DD06	15	RFFL	C2089901	02/26/91	04/12/91	2,554	45
A10748	1 NUTRASWEET CO.	S/T/C SPENT PD CATAL	NJA1001005	DD01	10	RFFL	C2089301	02/28/91	03/19/91	749	19	
A10749	1 NUTRASWEET CO.	S/T/C SPENT PD CATAL	NJA1001005	DD01	16	RFFL	C2089301	02/28/91	03/22/91	1,197	22	
157974	1 DEVON AUTOCAT	SPENT CHLORIC SOLN	NJA1011669	DD05	50	W16	C2115001	03/08/91	06/11/91	5,034	95	
157975	1 DEVON AUTOCAT	TPH AMINE SOLN S/T/	NJA1011669	DD02	DD05	2	W18	C2105901	03/08/91	05/03/91	229	56
157976	1 DEVON AUTOCAT	SPENT AMINE SOLN S/T	NJA1011669	DD02	DD05	3	W18	C2105901	03/08/91	05/03/91	954	56
157977	1 DEVON AUTOCAT	SPENT AMINE SOLN S/T	NJA1011669	DD02	DD05	5	W18	C2105901	03/08/91	05/03/91	539	56
157978	1 DEVON AUTOCAT	SPENT AMINE SOLN S/T	NJA1011669	DD05	1	W18	C2103901	03/08/91	05/03/91	461	56	
157979	1 ENVIRONMENTAL PRODUCTS	SPENT TPH AMINE SOLN	NJA1031669	DD05	13	W18	C2116101	03/08/91	06/05/91	1,346	89	
157980	1 ENVIRONMENTAL PRODUCTS	TPH H SOLN S/T/C PM	NJA1011669	DD01	2	RFFL	C2112101	03/11/91	06/11/91	128	92	
157989	1 ENVIRONMENTAL PRODUCTS	RAGS/WITHS S/T/C PM	NJA1011669	DD01	1	RFFL	C2112101	03/11/91	05/28/91	1	78	
157995	1 DEVON AUTOCAT	SCRAP CATALYSTS S/T/	NJA1011669	DD05	31	CNPY	E8553C1	03/14/91	06/23/91	23	162	
157996	1 DEVON AUTOCAT	SCRAP CATALYSTS S/T/	NJA1011669	DD05	32	CNPY	T9861201	03/14/91	10/03/91	23	263	
A10860	1 THE NUTRASWEET CO.	S/T/C SPENT CATALYST	NJA1001005	DD01	24	ISFL	C2093701	03/15/91	04/03/91	55	19	
A10859	1 THE NUTRASWEET CO.	S/T/C SPENT CAT/HTS	NJA1001005	DD01	32	ISFL	C2095501	03/15/91	04/08/91	1,149	24	
A10870	1 NUTRASWEET	S/T/C SPENT CAT	NJA1001005	DD01	9	ISFL	C2093701	03/15/91	04/02/91	221	13	
158000	1 DEVON AUTOCAT	S/T/C SPENT SOLN CHL	NJA1011669	DD05	--							

WASTE MANIFEST SUMMARY

JM	358,769 kg
DUST	328,308 kg
BEST	419,612 kg

02/05/92

LOGSHEET CUSTOMER	DESCRIPTION	MANIFEST	WASTE TYPE	DRW LOC	NEXTDUE RECEIVED	DATE	BEST	PROCESS	
							KG	DAYS	
I58002 1 DEVON AUTOCAT	S/T/C SPENT SOLN CHL	NJA1011669	0002 0005	4 W25	C2111001 03/15/91 05/24/91	302	70		
I58003 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMT	NJA1011669	0005	2 W15	C2116001 03/15/91 05/24/91	170	70		
I58004 1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT SOLN AMT	NJA1011669	0002 0005	30 W15	C2114001 03/15/91 06/14/91	2,765	91		
A3C095 1 DUPONT-BEAUMONT	FISH OIL S/T/C PM	NJA1001005	0001 0002	1 RFFL	C2113001 03/18/91 06/06/91	9,729	80		
I58021 1 ENVIRONMENTAL PRODUCTS	S/T/C AQUEOUS SPENT	NJA1011669	0002	2 W20	C2121201 03/22/91 08/07/91	81	108		
I58025 1 DEVON AUTOCAT	S/T/C SPENT SOLN CRL	NJA1011669	0002 0005	14 W20	C2136001 03/22/91 06/24/91	1,293	94		
I58026 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1011669	0002 0005	14 W20	C2136001 03/22/91 06/24/91	1,530	94		
A10955 1 FLI LILLY & CO.	S/T/C SPENT PD ON CA	NJA1001005	0001	1 RFFL	C2100901 03/26/91 04/22/91	3,445	27		
A10956 1 FLI LILLY & CO.	S/T/C SPENT PD ON AL	NJA1001005	0005 0001	1 V74	T9008201 03/26/91 05/28/91	5	63		
I58039 1 MECHANICAL	SCRUBBER PIPE RCS S/	NJA1011669	0002	1 RFFL	C2110001 03/28/91 05/28/91	154	62		
I58040 1 MECHANICAL	AQUA REGIA SOLN S/T/	NJA1011669	0002	1 RFFL	C2093601 03/28/91 04/04/91	58	7		
I58041 1 MECHANICAL	AQUA REGIA SOLN S/T/	NJA1011669	0002	1 RFFL	C2093601 03/28/91 04/05/91	91	8		
I58042 1 MECHANICAL	AQUA REGIA SOLN S/T/	NJA1011669	0002	1 RFFL	C2093601 03/28/91 04/04/91	114	7		
I58043 1 BTOMED-WW	BIMED WASTE SOLN-N-C	NJA1011669	0003 0002 0001	1 V785		03/28/91 07/29/91	36	123	
A10990 1 THE NUTRASWEET CO.	S/T/C SPENT CATALYST	NJA1001005	0001	27 RFFL	C2100401 04/01/91 04/17/91	1,840	16		
A11003 1 ALDRICH CHEMICAL	S/T/C RH ON CARBON	NJA1001005	0001	1 RFFL	C2107001 04/03/91 04/26/91	134	25		
A11029 1 UNITED REFINING	S/T/C PD WASTE SOLN	NJA1001005	0002	1 RFFL	C2093601 04/02/91 04/04/91	659	2		
I58053 1 DEVON AUTOCAT	SPENT SOLN S/T/C PM	NJA1020257	0005	50 W22	C2116001 04/05/91 06/27/91	5,078	83		
I58054 1 DEVON AUTOCAT	SPENT SOLN S/T/C PM	NJA1020257	0002 0005	39 W60	C2116001 04/05/91 06/26/91	3,807	82		
I58055 1 DEVON AUTOCAT	SPENT SOLN S/T/C PM	NJA1020257	0005	4 W20	C2116001 04/05/91 07/03/91	399	89		
I58056 1 DEVON AUTOCAT	SPENT TPHC SOLN S/T/	NJA1020257	0002 0005	3 W60	C2116001 04/05/91 06/25/91	345	81		
I58057 1 DEVON AUTOCAT	SPENT SOLN ARINES S/	NJA1020257	0005	2 W20	C2116001 04/05/91 07/02/91	329	88		
A11084 1 THE NUTRASWEET CO.	SPENT CATALYST S/T/C	NJA0993023	0001	27 RFFL	C2101001 04/08/91 04/19/91	1,797	11		
A11085 1 NUTRASWEET	SPENT CATALYST S/T/C	NJA0978660	0001	7 RFFL	C2101001 04/08/91 04/19/91	608	11		
A11086 1 NUTRASWEET	MISC FILTER CARTRIDGES	NJA0978660	0001	57 SOSA	C2104101 04/08/91 04/29/91	3,504	21		
A11108 1 SHELL OIL CO.	DUST/FINES S/T/C PM	NJA1018036	0001	59 SENT	T9846201 04/10/91 06/19/91	8,794	70		
A11128 1 VANGUARD	RESIDUES S/T/C PM	NJA1018036	0011	5 W26		04/31/91 04/16/91	531	5	
I58072 1 DEVON AUTOCAT	SCRAP CATALYSTS S/T/	NJA1020254	0005	65 CNPY	T9855601 04/15/91 08/23/91	5,110	130		
A11195 1 MALLINCKRODT	S/T/C PT ON CARBON	NJA1017956	0002	14 RFFL	T9843901 04/17/91 05/23/91	3,793	36		
A11214 1 THE NUTRASWEET COMPANY	S/T/C SPENT CATALYST	NJA1017966	0001	23 RFFL	C2105001 04/22/91 05/02/91	1,882	10		
A11215 1 NUTRASWEET	S/T/C SPENT CATALYST	NJA1017966	0001	7 RFFL	C2105001 04/22/91 05/02/91	515	10		
A11216 1 NUTRASWEET	MISC FILTERS S/T/C P	NJA1017966	0001	53 RFFL	C2108601 04/22/91 05/20/91	3,716	28		
A11221 1 TEXAS-EASTMAN	SPENT CATALYST S/T/C	NJA1017966	0001	56 RFFL	T9851501 04/22/91 07/11/91	10,050	80		
A11315 1 THE NUTRASWEET COMPANY	SPENT CAT S/T/C PDSP	NJA0993025	0001	28 TBWR	C2109601 05/06/91 05/21/91	2,528	15		
I58118 1 DEVON AUTOCAT	SPENT SOLN CHLORIDES	NJA1020258	0002 0005	40 W20	C2121201 05/07/91 08/08/91	3,859	93		
I58119 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	6 W20	C2116001 05/07/91 06/28/91	579	52		
I58120 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	12 W20	C2121201 05/07/91 06/10/91	1,170	95		
I58121 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	3 W20	C2121201 05/07/91 06/08/91	212	93		
I58122 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	2 W20	C2116001 05/07/91 06/28/91	44	52		
I58123 1 DEVON AUTOCAT	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	2 W20	C2116001 05/07/91 06/28/91	205	52		
I58124 1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	8 W20	C2116001 05/07/91 07/02/91	779	56		
I58125 1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT SOLN AMI	NJA1020258	0002 0005	1 W20	C2121201 05/07/91 07/31/91	118	85		
I58126 1 DEVON AUTOCAT	RESIDUE S/T/C PH	NJA1020258	0002 0005	6 W20	T9847901 05/07/91 06/14/91	326	38		
I58137 1 ENVIRONMENTAL PRODUCTS	MISCELLANEOUS S/T/C	NJA1020260	0001	2 RFFL	C2108001 05/10/91 05/21/91	58	11		
I58139 1 ENVIRONMENTAL PRODUCTS	TYPE H SOLN S/T/C PM	NJA1020260	0001	1 RFFL	C2121201 05/10/91 06/10/91	3	31		
A11368 1 DUPONT BEAUMONT	FISH OIL S/T/C PM	NJA1001009	0001 0002	52 RFFL	T9851201 05/13/91 07/16/91	9,466	66		
A11370 1 TENNESSEE EASTMAN	SPENT CAT S/T/C RH	NJA0617525	0001 0010	3 RFFL	C2113001 05/14/91 06/04/91	111	21		
A11371 1 THE NUTRASWEET CO.	SPENT CAT S/T/C PD	NJA0993026	0001	25 RFFL	C2109601 05/14/91 05/22/91	1,964	14		
A11372 1 NUTRASWEET	SPENT CAT S/T/C PM	NJA0978662	0001	7 RFFL	C2109601 05/14/91 05/26/91	536	14		
A11421 1 DUPONT-TOWNEA	S/T/C PH WASTE MATL	NJA1029127	0011	2 RFFL	T9849301 05/22/91 06/07/91	143	16		
A11422 1 DUPONT-TOWNEA	S/T/C PH WASTE MATL	NJA1029127	0011	1 RFFL	C2124201 05/22/91 06/07/91	12	16		
A11423 1 VANGUARD	SWFPPS S/T/C PH	NJA1111653	0001 0011	9 SOSA		05/22/91 05/30/91	2,175	3	
A11424 1 VANGUARD	SWFPPS S/T/C PH	NJA1111654	0001 0011	1 SOSA		05/22/91 05/30/91	2,175	3	

WASTE MANIFEST SUMMARY

DR	358,769 KG
CUST	328,388 KG
BSI	419,612 KG

02/05/92

LOGSHEET	CUSTOMER	DESCRIPTION	MANIFEST	WASTE TYPE	DRF LOC	NEXTLOG	RECEIVED	DATE	WEIGHT	PROCESS	XG	DAYS	
A11530	1 TEXAS EASTMAN	SPENT CATALYST S/T/C	NJA1011668	0001	32 W12	T9857801	06/03/91	08/22/91	1,681	BO			
A11532	1 THE NUTRASWEET CO.	SPENT CATALYST S/T/C	NJA0993027	0001	26 RFFL	C2113201	06/03/91	06/20/91	2,002	17			
A11533	1 THE NUTRASWEET CO.	SPENT CAT W/PAPERS	NJA0993027	0001	33 TGPL	C2115601	06/03/91	06/21/91	660	16			
A11534	1 NUTRASWEET	SPENT CAT S/T/C PD	NJA0978663	0001	7 TGPL	C2113201	06/03/91	06/20/91	624	17			
A11535	1 NUTRASWEET	SPENT CAT W/FILTERS/PAPER	NJA0978663	0001	35 RFFL	C2116601	06/03/91	07/02/91	2,063	29			
A11610	1 DUPONT BEAUMONT	FISH OIL S/T/C PM	NJA1001010	0002	52 W18	C2130901	06/13/91	09/20/91	9,968	99			
A11611	1 THE NUTRASWEET CO.	SPENT PD CATALYST	NJA0993028	0001	26 TGPL	C2115601	06/13/91	06/27/91	1,954	14			
A11612	1 VANGJARD	SWEEPS S/T/C PM	NJA1111655	0011	1 SOSA		06/23/91	06/25/91	116	12			
I58184	1 DEVON AUTOCAT	SCRAP AUTOCAT S/T/C	NJA1D20259	0005	1 CNPY	T9863401	06/14/91	10/27/91	5,940	130			
A11685	1 TEXAS EASTMAN	S/T/C SPENT RH CAT	NJA1011675	0001	24 W20	T9857901	06/24/91	08/30/91	4,066	67			
A11700	1 THE NUTRASWEET CO.	S/T/C SPENT PD CATAL	NJA0993029	0001	13 RFFL	C2119501	06/26/91	07/17/91	956	21			
A11701	1 NUTRASWEET	S/T/C SPENT PD CATAL	NJA0978664	0001	6 RFFL	C2119501	06/26/91	07/16/91	552	22			
I58221	1 DEVON AUTOCAT	SPENT CHLORIDES S/T/	NJA1020261	0002	45 W20	C2131901	06/26/91	09/30/91	5,055	96			
I58222	1 DEVON AUTOCAT	SPENT CHLORIDES S/T/	NJA1020261	0002	25 W20	C2131901	06/26/91	09/25/91	2,812	91			
I58223	1 DEVON AUTOCAT	SPENT AMINFS(PROD) SRANGEN	NJA1C20261	0002	5 W20	C2121201	06/26/91	08/12/91	498	47			
I58224	1 DEVON AUTOCAT	SPENT AMINFS(DEV) S/M	NJA1020261	0002	4 W20	C2121201	06/26/91	08/14/91	481	49			
I58225	1 DEVON AUTOCAT	SPENT AMINFS(PSG) S/LLCW	NJA1020261	0002	1 W20	C2125401	06/26/91	08/19/91	119	54			
I58226	1 DEVON AUTOCAT	SPENT AMINFS(PSG)/TPHC/BLN	NJA1020261	0002	1 W20	C2125401	06/26/91	08/19/91	111	54			
I58227	1 ENVIRONMENTAL PRODUCTS	SPENT AMINES S/T/C P	NJA1020261	0002	0005	12 W20	C2131901	06/26/91	09/18/91	1,299	84		
A11737	1 THE NUTRASWEET COMPANY	SPENT CATALYST S/T/C	NJA0993030	0001	29 RFFL	C2119501	07/01/91	07/17/91	2,172	16			
A11788	1 THE NUTRASWEET CO.	S/T/C SPENT PD CAT	NJA0993031	0001	16 RFFL	C2119501	07/11/91	07/29/91	1,248	18			
A11789	1 NUTRASWEET	SPENT CAT FILTERS S/	NJA0978665	0001	14 TGPL	C2118801	07/11/91	07/29/91	541	18			
A11790	1 NUTRASWEET	S/T/C SPENT PD CATAL	NJA0993032	0001	9 RFFL	C2119501	07/11/91	07/29/91	599	18			
A11844	1 THE NUTRASWEET CO.	S/T/C SPENT PD CATAL	NJA0993032	0001	30 TGPL	C2120901	07/18/91	07/30/91	2,226	12			
I58222	1 DEVON AUTOCAT	S/T/C SPENT CHLORIDE	NJA1020292	0005	0002	40 RFFL	C2136001	07/18/91	10/29/91	4,438	102		
I58273	1 DEVON AUTOCAT	S/T/C SPENT CHLORIDE	NJA1020292	0005	0002	4 RFFL	C2121201	07/18/91	08/14/91	431	27		
I58274	1 DEVON AUTOCAT	S/T/C SPENT AMINE SOANGE	NJA1020292	0005	0002	5 RFFL	C2138701	07/18/91	08/15/91	449	28		
I58275	1 DEVON AUTOCAT	S/T/C SPENT AMINE SOANGE	NJA1020292	0005	0002	8 RFFL	C2139201	07/18/91	08/15/91	933	28		
I58276	1 DEVON AUTOCAT	S/T/C SPENT AMINE SONJ	NJA1020292	0005	0002	5 RFFL	C2125401	07/18/91	08/19/91	402	32		
I58277	1 DEVON AUTOCAT	S/T/C SPENT AMINE SOAV	NJA1020292	0005	0002	3 RFFL	C2125401	07/18/91	08/19/91	315	32		
I58278	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT AMINE SOUE	NJA1020292	0005	0002	1 RFFL	C2125401	07/18/91	08/19/91	58	32		
I58279	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT AMINE SORPIL	NJA1020292	0005	0002	7 RFFL	C2125401	07/18/91	08/19/91	657	32		
I58280	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT AMINE SONK	NJA1020292	0005	0002	10 RFFL	C2136001	07/18/91	10/22/91	1,083	96		
I58281	1 ENVIRONMENTAL PRODUCTS	S/T/C SPENT AMINE SOFFN	NJA1020292	0005	0002	7 RFFL	C2125401	07/18/91	08/29/91	726	42		
I58290	1 ENVIRONMENTAL PRODUCTS	QC SPENTS AQUEOUS ,5,11	NJA1020294	0002	5 RFFL	C2125401	07/25/91	08/28/91	520	34			
A11914	1 THE NUTRASWEET CO.	S/T/C SPENT PD/C -(H)	NJA0993033	0001	20 TGPL	C2120901	07/29/91	08/12/91	1,453	14			
A12000	1 THE NUTRASWEET COMPANY	S/T/C SPENT PD CATAL	NJA0993034	0001	25 TGPL	C2177101	08/09/91	08/22/91	1,054	13			
A12013	1 UNITED REFINING	S/T/C RN SULFATE SOL	NJA1010293	0002	1 RFFL	C2125501	08/12/91	08/24/91	51	12			
I58308	1 DEVON AUTOCAT	SPENT SOLN CHLORIDES	NJA1020293	0005	0002	30 W20	C2138001	08/13/91	11/11/91	3,434	90		
I58309	1 DEVON AUTOCAT	SPENT SOLN CHLORIDES	NJA1020293	0005	0002	40 W20	C2138701	08/13/91	11/20/91	4,531	99		
I58310	1 DEVON AUTOCAT	SPENT SOLN AMINES (P)	NJA1020293	0005	0002	3 W20	C2136001	08/13/91	10/28/91	370	76		
I58311	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN TPH	NJA1020293	0005	0002	3 W20		08/13/91	11/11/91	342	90		
I58312	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN TPH/RHN03	NJA1020293	0005	0002	9 W43	C2155301	08/13/91	12/17/91	887	121		
I58313	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN PCNO3	NJA1020293	0005	0002	3 W45		08/13/91	ND PROCES	303	177		
I58316	1 DEVON AUTOCAT	SCRAP AUTOCAT S/T/C	NJA1020262	0005	1 CNPY	T9863601	08/15/91	10/22/91	6,558	68			
I58317	1 DEVON AUTOCAT	SCRAP AUTOCAT S/T/C	NJA1020262	0005	1 CNPY	T9863601	08/15/91	10/22/91	1,136	68			
A12047	1 THE NUTRASWEET CO.	S/T/C SPENT PD CAT	NJA0993036	0001	33 TGPL	C2177101	08/20/91	09/23/91	2,261	70			
A12048	1 NUTRASWEET	S/T/C SPENT PD CA-	NJA0918667	0001	9 TGPL	C2177101	08/20/91	09/28/91	815	70			
A12049	1 ALDRICH CHEMICAL CO.	S/T/C SPENT PT/PD CNN	NJA1010297	0001	4 T9860001	08/20/91	08/16/91	178	27				
A12050	1 ALDRICH CHEMICAL CO.	S/T/C SPENT RH CNN CA	NJA1010297	0001	1 C2133201	08/23/91	08/19/91	43	30				
A12051	1 ALDRICH CHEMICAL CO.	R-SIDUES/H1SC, HATL, STI	NJA1C18227	0001	1 DBST	T9862H01	08/20/91	09/16/91	5	27			
A12112	1 THE NUTRASWEET CO.	S/T/C SPENT PD CAT	NJA0993037	0001	22 TGPL	C2130601	08/29/91	09/12/91	1,377	14			

WASTE MANIFEST SUMMARY

DR	356,769 KG
CUST	328,388 KG
BEST	419,612 KG

02/05/92

LOGSHEET	CUSTOMER	DESCRIPTION	MANIFEST	WASTE TYPE	DR#	LOC	NEXTLOG	RECEIVED	DATE	BEST	PROCESS	KG	DAYS
158365	1 DEVON AUTOCAT	SPENT SOLN CHLORIDE	NJA1020296	DD02 D005	30	W43	C2155301	08/29/91	12/12/91	3,353	105		
158366	1 DEVON AUTOCAT	SPENT SOLN DEV CHLOR	NJA1020295	DD02 D005	3	W22	C2136001	08/29/91	10/28/91	353	60		
158367	1 DEVON AUTOCAT	SPENT SOLN CHLORIDES	NJA1020296	DD02 D005	8	W22	C2138701	08/29/91	11/26/91	749	83		
158368	1 DEVON AUTOCAT	SPENT SOLN AMINES	NJA1020296	DD02 D005	10	W45	C2155301	08/29/91	12/12/91	1,082	105		
158369	1 DEVON AUTOCAT	SPENT SOLN AMINES P	NJA1020296	DD02 D005	3	W47	C2155301	08/29/91	12/13/91	353	106		
158370	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN AMINES	NJA1020296	DD02 D005	7	W43	C2155301	08/29/91	12/17/91	807	105		
158371	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN AMINES TP	NJA1020296	DD02 D005	5	W20	C2138001	08/29/91	11/11/91	884	74		
158372	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN AMINES TP	NJA1020296	DD02 D005	3	W43	C2155301	08/29/91	12/13/91	525	106		
✓ A12182	1 THE NUTRASWEET COMPANY	S/T/C SPENT PU CATAL	NJA0993038	0001	96	ICFL	C2130401	09/09/91	09/23/91	1,975	14		
✓ A12200	1 MALLINCKRODT	S/T/C SPENT PT ON CA	NJA1017968	0001 D036	7		C2135401	09/11/91	10/16/91	1,012	95		
✓ A12201	1 MALLINCKRODT	S/T/C SPENT PT ON CA	NJA1017968	0001 D036	7		C2135401	09/11/91	10/15/91	825	94		
✓ A12231	1 VANGUARD	SWEEPS S/T/C PM	NJA1111793	D008 D011	8	SOSA		09/13/91	03/24/91	1,110	11		
✓ A12233	1 ETECH SYSTEMS CORP.	PLATING SOLN	NJA0839945		1	RFFI	C2132301	09/13/91	09/30/91	215	17		
✓ A12234	1 TEXAS EASTMAN	SPENT RH SOLN	NJA1013689	0001	59	IGN	T9866101	09/13/91	11/04/91	7,519	52		
✓ A12235	1 TEXAS EASTMAN	FILTERS/RESIDUE	NJA1011689	0001	1	IGN	C2138101	09/13/91	10/30/91	12	47		
✓ A13077	1 NUTRASWEET	SPENT PU CAT	NJA0993040		23	IGN	C2135701	09/26/91	10/14/91	1,184	18		
✓ A13078	1 NUTRASWEET-ZEELAND	SPENT PU CAT	NJA0978668		9	IGN	C2133701	09/26/91	10/10/91	652	14		
✓ A13079	1 NUTRASWEET-ZEELAND	SPENT CAT FILTERS	NJA0978668		12	IGN	T9863201	09/26/91	10/10/91	429	22		
✓ A13080	1 NUTRASWEET-ZEELAND	PU ON CARBON CAT	NJA0978668		1	DSVT	C2133701	09/26/91	10/10/91	30	14		
✓ A13081	1 NUTRASWEET ZEELAND	SPENT PU CAT	NJA0978668		2	DSVT	C2135701	09/26/91	10/14/91	198	18		
✓ A13082	1 DUPONT BEAUMONT	FISH OIL	NJA1001011		52	W22	C2138101	09/26/91	11/08/91	8,885	43		
✓ A13083	1 DUPONT BEAUMONT	RAGS/WIPES	NJA1001011		3	DSVI	T9882501	09/26/91	11/07/91	100	42		
✓ A13084	1 DUPONT BEAUMONT	RESIDUE	NJA1001011		1	DSVT		09/26/91	11/08/91	201	43		
155058	1 DEVON AUTOCAT	SPENT SOLN (ORANGE)	NJA1254800		30	W20	C2155301	10/01/91	01/06/91	3,413	128		
155059	1 DEVON AUTOCAT	SPENT SOLN	NJA1254800		29	W22		10/01/91	01/08/91	3,273	128		
155060	1 DEVON AUTOCAT	SPENT SOLN (BLUE)	NJA1254800		8	W20		10/01/91	01/11/91	707	128		
155061	1 DEVON AUTOCAT	SPENT SOLN (DR.TOPS)	NJA1254800		20	W22	C2155301	10/01/91	01/07/91	2,035	128		
155062	1 DEVON AUTOCAT	SPENT SOLN (PURPLE)	NJA1254800		5	W22	C2155301	10/01/91	12/13/91	557	73		
* A13077	2 NUTRASWEET	MET.OVERSIZE	NJA0993040		1	MRFL	C2134101	10/05/91	10/08/91	5	3		
* A13208	1 DUPONT-RTP	GLOVES,WIPES,MISC PM	NJA1017836		6	W19	T9864501	10/10/91	10/25/91	182	15		
✓ A13209	1 DUPONT-RTP	MISC.PM SOLN	NJA1017836		4	W19	C2135901	10/10/91	10/24/91	848	14		
✓ 155083	1 DEVON AUTOCAT	SERAP AUTOCAT	NJA1020295		1	SENT	T9868101	10/15/91	11/26/91	5,911	42		
✓ A13265	1 ELI LILLY & COMPANY	SPENT CATALYST	NJA1107820		134	W34	C2154601	10/17/91	12/20/91	15,332	64		
155094	1 ENVIRON.PROD	SPENT AQUEOUS SOLN	NJA1254803		2	W64		10/18/91	01/14/91	170	111		
155095	1 ENVIRON.PROD	METAL SCRAP CAT	NJA1254803		2	W64		10/18/91	01/10/92	213	84		
155096	1 ENVIRON.PROD	METAL SCRAP CAT	NJA1254803		2	W64		10/18/91	01/10/92	239	84		
155097	1 ENVIRON.PROD	METAL SCRAP CAT	NJA1254803		3	W64		10/18/91	01/10/92	218	84		
155098	1 ENVIRON.PROD	METAL SCRAP CAT	NJA1254803		2	W64		10/18/91	01/10/92	470	84		
155099	1 DEVON AUTOCAT	SPENT CHLORTDE SOLN	NJA1254801		45	W18		10/18/91	01/20/91	3,081	111		
155100	1 DEVON AUTOCAT	SPENT AMINE SOLN	NJA1254801		4	W41		10/18/91	01/14/91	490	111		
155101	1 DEVON AUTOCAT	SPENT AMINE SOLN	NJA1254801		2	W41		10/18/91	01/14/91	243	111		
✓ A13353	1 THE NUTRASWEET COMPANY	SPENT PU CATALYST	NJA0993042		40	W72	C2151701	10/29/91	11/12/91	1,683	14		
155105	1 DEVON AUTOCAT	SPENT SOLN CHLORIDES	NJA1254804		35	W22		10/30/91	NO PROCESS	3,910	99		
155106	1 DEVON AUTOCAT	SPENT SOLN AMINES	NJA1254804		8	W22		10/30/91	01/14/91	888	99		
155108	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN/ORANGE	NJA1254804		2	W41		10/30/91	01/10/91	558	99		
155109	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN TPH/GREEN	NJA1254804		3	W41		10/30/91	01/10/91	557	99		
155110	1 ENVIRONMENTAL PRODUCTS	SPENT SOLN TPH/ROUND/YELLOW	NJA1254804		2	W41		10/30/91	12/13/91	226	41		
155112	1 MECHANICAL	AQUA REGIA SOLN	NJA1113525		1	W72	C2137601	10/31/91	11/05/91	89	5		
✓ 155113	1 MECHANICAL	PM PROBE WASH SOLN	NJA1113525		2	DSVT	C2152601	10/31/91	12/02/91	5	32		
✓ 155114	1 MECHANICAL	MISC.PM SOLN	NJA1113525		1	W72	C2137601	10/31/91	11/05/91	119	5		
3379	1 VANGUARD	SWTPRS	NJA1112602		12	SAMP		11/01/91	11/10/91	1,618	12		
380	1 VANGUARD	POWDERS(PH)	NJA1112602		1	W24	C2151601	11/01/91	11/13/91	2	12		
✓ 3379	1 VANGUARD	POWDERS(PH)	NJA1112602		1	DSVT	C2138101	11/17/91	11/23/91	1	1		



Bellino/Braggad
Smolka/Levin

Johnson⁹Matthey³⁷

AIR & WASTE
MGT. DIV.

August 21, 1991

Three handwritten circles containing initials. The top circle contains "J". The middle circle contains "B". The bottom circle contains "JB".

Mr. Constantine Sidamon-Eristoff
Regional Administrator
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Re: Exemption from Boiler and Industrial Furnace Regulations

Dear Administrator Sidamon-Eristoff:

The Johnson Matthey Inc., Materials Technology Division operates a specialty chemicals manufacturing facility in West Deptford, New Jersey. An integral part of this facility is the operation of a precious metals recovery facility, which incorporates use of furnaces and afterburners to recover the precious metal from our own and our customer's material.

This facility has an EPA ID No. NJD 980755367, and is exempt from hazardous waste facility permit requirements under existing federal and New Jersey hazardous waste regulations codified as N.J.A.C. 7:26-12.1 (e). The facility currently has air pollution certificates to operate issued by the New Jersey Department of Environmental Protection (NJDEP) pursuant to N.J.A.C. 7:27-8.

Because the nature of this operation is to recover materials by combustion, we examined the U.S. EPA regulations governing the combustion of hazardous waste in boilers and industrial furnaces (BIF) adopted February 21, 1991 (56 FR 7134, et seq) to determine their applicability to our facility. Based upon this review, we conclude that we are an existing facility, as defined in 40 CFR 266.103, because we have been processing these materials prior to August 21, 1991. We do not believe that this rulemaking changes our current exemption from hazardous waste permitting.

In addition, we believe that we are exempt from the BIF regulations as a result of our precious metal reclamation activity. The exemption was implicit in the hazardous waste regulations at the federal and state level, but at the request of the International Precious Metals Institute, a trade organization, the U.S. EPA has issued a technical amendment clarifying the BIF rule, signed by the EPA administrator on August 16, 1991. A copy of the relevant pages of this exempting amendment are attached. It is anticipated that the Federal Register notice will occur within a week or so.

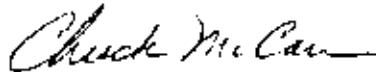
Based upon our review of this amendment, and a discussion between Mr. John Brogard of your Hazardous Waste Facilities Branch and Mr. Richard Craig of Roy F. Weston, we are confident we are exempt from the BIF regulations. The only remaining issue is the status under the one-time reporting notice requirement under BIF, due to be filed on August 21, 1991. In order to prevent any future confusion, please accept this letter as confirmation that the Johnson Matthey facility in West Deptford, New Jersey is notifying the U.S. EPA and the NJDEP that we are indeed exempt from the Boiler and Industrial Furnace Regulations as adopted February 21, 1991 and amended August 16, 1991.

Per 40 CFR 266.100(f), the Johnson Matthey facility in West Deptford, New Jersey:

- 1) Claims exemption under this paragraph,
- 2) Certifies that hazardous waste is burned for legitimate recovery of precious metal; and
- 3) Certifies that the facility will comply with the sampling, analysis and recordkeeping requirements of this paragraph

Should you have any questions regarding this matter, please feel free to contact me at (609) 384-7091.

Very truly yours,



Chuck McCann
Manager - Safety, Health and Environment

encl
cc: F.J.Opet
R.M.DeCicco
R.R.Trott
J.Brogard, U.S.EPA
T.Sherman, NJDEP
R.Craig, Roy F. Weston

AUG-19-1991 13:28 FROM EPA Docket DTEC WTB TO 8503753042B P.02

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linotyping), and spent jumper cables -- which the Agency is also including. (CEPA notes, however, that all of these materials must actually contain recoverable amounts of lead to be deemed burned for metal recovery. See new §266.100(c)(3).) Similarly, we have included in Appendix XII a list of nickel or chromium-bearing materials that are legitimately recycled for metal value by nickel-chromium recovery furnaces that are not generated by manufacturers or users of nickel, chromium, or iron (e.g., electroplating wastewater treatment sludges, and nickel-cadmium and nickel-iron batteries).

In addition, we note that several lead-bearing materials that have been historically processed in lead recovery furnaces have not been included on the Appendix XI list: by-product drosses, slurry and slurry screenings, slags, and scrap lead. We did not include these materials because they are either not solid wastes when recycled or are exempt from regulation when recycled. See §§261.2(c)(3) and 261.6(a)(3)(iv).

Finally, we note that the Agency may determine that a material on Appendices XI or XII burned at a particular metal recovery furnace may have levels of toxic organic constituents substantially higher than a total of 500 ppm. (The Agency could make this determination because owners and operators claiming the exemption must notify the Agency. The Agency may then obtain waste analysis data or other information from the facility record or from EPA sampling that indicates the presence of high levels of toxic organic constituents.) The amended rule enables the Agency to determine on a case-by-case basis that the material may pose a hazard to human health and the environment when burned in a metal recovery furnace due to presence of toxic organic constituents at levels exceeding a total of 500 ppm, and to order that the burning either cease or be conducted in compliance with the BIF rule. The Agency is adopting this extra safeguard even though the rule already provides that, to be exempt from the <1,000 lb/tB and <500 ppm toxic organics tests, the material cannot be listed for a toxic organic constituent or fail the Toxicity Characteristic (TC) for a toxic organic constituent. The waste might still contain high levels of toxic organic constituents that are not included in the TC or the material's matrix may not readily leach toxic organic constituents during the TC extraction procedure but would be liberated during burning in the furnace. In making the determination, EPA would consider the concentration and toxicity of toxic organic constituents in the material, the level of destruction of toxic organic constituents provided by the furnace, and whether the acceptable ambient levels established in Appendices IV and V of Part 266 may be exceeded for any toxic organic compound that may be emitted (i.e., including products of incomplete combustion) based on dispersion modeling to predict the maximum annual average off-site (unless a person resides on-site) ground level concentration.

Should the Director determine that burning particular wastes with organic contaminants in a metal recovery furnace poses a hazard to human health and the environment, as explained above, the Agency would issue a notice to the company burning the waste indicating the basis for this tentative determination. The company would have an opportunity to respond to the determination but could not burn the waste in the interim. The Director would then make a final determination and document the basis for his conclusion. If the conclusion is that the waste would pose a hazard, then further burning would be illegal unless performed in compliance with the BIF rules. (It also may be possible to pretreat the waste to remove or destroy organics, and then burn it safely.) The determination would only apply to subsequent burning, however. There would be no enforcement penalties for burning occurring before the Director's tentative determination.

10. Precious Metal Recovery Furnaces Engaged in Legitimate Metal Recovery Are Not Regulated by the BIF Rule. EPA has been asked about the regulatory status of precious metal recovery operations under the BIF rules. Such operations are generally exempt from subtitle C regulation (with the exception of certain

8/1991

tracking and recordkeeping requirements). See 40 CFR Part 266, Subpart F and 50 FR at 6448 (Jan. 4, 1985). This is because the value of precious metal in the wastes provides a strong incentive for proper handling. *Id.* (In addition, land disposal of the wastes is prohibited under Part 266.)

EPA interprets this exemption as continuing to apply so that industrial furnaces¹³ engaged in legitimate precious metal recovery operations are not subject to regulation under the BIF rule. Not only does the text of §266.70 support this result, but the rationale for the exemption still holds. The value of the precious metals ensures proper handling not only before recycling, but during the recycling process. Recovery of particulate matter from air emissions is in fact typically maximized in the metal recovery process due to the value of these metals. EPA also notes that the technical provisions of the BIF rule may not be applicable to the precious metal recovery process. Initial thermal oxidation of materials normally must be done slowly at relatively low temperatures in order not to drive the precious metals off in flue gas. Combustion at the 1800 °F temperature specified in the rule for interim status facilities (see §266.103(a)(5) for furnaces that feed hazardous waste at locations other than the "hot end") would be self-defeating. (Precious metal furnaces are, however, typically equipped with afterburners and secondary combustion chambers to destroy any pyrolyzed organics and to assist in further recovering precious metals.)

In order to clarify that the exemption in Part 266, Subpart F, continues to apply, EPA is adding a conforming amendment to §266.100(f) (applicability of BIF rule) to indicate that legitimate precious metal recovery operations are not subject to the rule. The Agency indicated in the January 4, 1985 solid waste definition regulations some of the indicia of legitimate precious metal recovery operations. See 50 FR at 648-49. These include presence of economically significant amounts of precious metals, efficient recovery operations, no land disposal of wastes destined for recovery, and payment by the reclaimer to the waste's generator. Industry members indicate further that materials destined for precious metal reclamation are normally batch segregated into distinct and identified batches of like material, that generators and recovery facilities normally enter into written contracts before materials are transferred specifying compensation to the generator and when transfer is to occur, and that true precious metal recovery is characterized by net financial return to the generator (*i.e.*, a price sufficient to cover all charges for transport, storage, and processing).¹⁴ Presence of air pollution control equipment to recover any precious metals contained in emissions would be a further indication of a legitimate operation. Conversely, the absence of one or more of these features could serve as potential indications of a sham recycling operation, which would, of course, be subject not only to the BIF rules but to all other subtitle C provisions as well. See 50 FR at 649. Furthermore, under §261.2(f), persons ostensibly engaged in precious metal reclamation of hazardous wastes have the burden of proving (normally through recordkeeping plus presence of appropriate recovery equipment) that they are engaged in legitimate recovery activities. We have added a recordkeeping requirement to §266.100(f)(3) to ensure existence of proper documentation.

11. Records Must Be Kept Until Closure. In the final rule published on February 21, 1991, EPA inadvertently provided conflicting requirements for the length of time that monitoring, testing, and other information that must be included in the operating

¹³ That is, smelting, melting, and refining furnaces including pyrometallurgical devices such as cupolas, slotting machines, roasters, and foundry furnaces.

¹⁴ See correspondence from John C. Bullock, Healy & Harman, to J. Robert Holloway, EPA, July 16, 1991; and correspondence from John C. Bullock, Esq. to Steven Silverman, July 19, 1991 and attachments.

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40 CFR § 266.100 Applicability

(C) Whether the acceptable ambient levels established in appendices IV or V of this part may be exceeded for any toxic organic compound that may be emitted based on dispersion modeling to predict the maximum annual average off-site ground level concentration.

* * * * *

~~§ 266.100(e)(2)~~ Owners and operators of smelting, melting, and refining furnaces (including pyrometallurgical devices such as cupolas, sintering machines, roasters, and foundry furnaces) that process hazardous waste for recovery of economically significant amounts of the precious metals gold, silver, platinum, palladium, iridium, osmium, rhodium, or ruthenium, or any combination of these are conditionally exempt from regulation under this subpart, except for § 266.112. To be exempt from §§ 266.101 through 266.111, an owner or operator must:

(1) Provide a one-time written notice to the Director indicating the following:

(i) The owner or operator claims exemption under this paragraph;

(ii) The hazardous waste is burned for legitimate recovery of precious metal; and

(iii) The owner or operator will comply with the sampling and analysis and recordkeeping requirements of this paragraph; and

(2) Sample and analyze the hazardous waste as necessary to document that the waste is burned for recovery of economically significant amounts of precious metal using procedures specified by Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, incorporated by reference in § 260.11 of this chapter or alternative methods that meet or exceed the SW-846 method performance capabilities. If SW-846 does not prescribe a method for a particular determination, the owner or operator shall use the best available method; and

(3) Maintain at the facility for at least three years records to document that all hazardous wastes burned are burned for recovery of economically significant amounts of precious metal.

3. Section 266.102 is amended by revising the first two sentences of subparagraph (b)(1) and revising subparagraph (c)(10) to read as follows:

§ 266.102 Permit standards for burners.

* * * * *

(b) Hazardous waste analysis. (1) The owner or operator must provide an analysis of the hazardous waste that quantifies the concentration of any constituent identified in appendix VIII of part 261 of this chapter that may reasonably be expected to be in the waste. Such constituents must be identified and quantified if present, at levels detectable by analytical procedures prescribed by Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (incorporated by reference, see § 260.11 of this chapter). Alternative methods that meet or exceed the method performance capabilities of SW-846 methods may be used. If SW-846 does not prescribe a method for a particular determination, the owner or operator shall use the best available method. * * *

* * * * *



Sullivan

HS00989

Michele M. Putnam
Deputy Director

Hazardous Waste Operations

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Treia, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625
(609)633-1408

Lance R. Miller
Deputy Director

Responsible Party Remedial Action

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

28 OCT 1988

Johnson Matthey
Materials Technology Division
2001 Nolte Drive
West Deptford, NJ 08066
Attention: L. C. Pentz, Site Manager

NJD980755367

**RE: Administrative Order/Notice of Civil Administrative Penalty
Assessment**

Dear Mr. Pentz:

There is enclosed for service upon you an Administrative Order/Notice of Civil Administrative Penalty Assessment issued by the New Jersey Department of Environmental Protection pursuant to the provisions of the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq.

The Department is available to meet with the principals of the case to discuss the enclosed enforcement document. Should you want to arrange for such a meeting or have any questions, please contact Eleanor Peterson at 609-346-8000 within twenty (20) calendar days of receipt of this letter.

Any such meeting will not affect the time frames stipulated in the enclosed document.

Sincerely,

Karl J. Delaney
Assistant Director
Hazardous Waste Enforcement

KJD:krb
enclosure(s)

cc: Bureau of Compliance and Technical Services
Bureau of Hazardous Waste Engineering
Regional Field Office
Health Department
Mayor's Office

HS00989

Michele M. Putnam
Deputy Director

Hazardous Waste Operations



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Traia, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625
(609)633-1408

Lance R. Miller
Deputy Director

Responsible Party Remedial Action

28 OCT 1988

IN THE MATTER OF
JOHNSON MATTHEY, INC.

: ADMINISTRATIVE ORDER
AND
: NOTICE OF CIVIL ADMINISTRATIVE
PENALTY ASSESSMENT
:

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (hereinafter "NJDEP" or the "Department") by N.J.S.A. 13:1D-1 *et seq.* and the Solid Waste Management Act, N.J.S.A. 13:1E-1 *et seq.*, and duly delegated to the Assistant Director for Enforcement of the Division of Hazardous Waste Management pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- 1) The Department has determined that Johnson Matthey, Inc., is a generator and hazardous waste storage facility (EPA ID #NJD000692194) as defined by N.J.A.C. 7:26-1.6, and is located at Block 8802, Lot 3, Piney Hollow Road, Winslow Township, Camden County, New Jersey.
- 2) During an inspection conducted on June 20, 1988 by a representative of the Department at the above referenced facility, the following violation was revealed:

Johnson Matthey, Inc. operated a commercial hazardous waste storage facility in that Johnson Matthey, Inc. accepted and stored 107, fifty-five (55) gallon drums of EPA Hazardous Waste D001/D002 on site without having first submitted Part A and Part B of a permit application and without having received a finally effective permit issued by the Department. This is a violation of N.J.A.C. 7:26-12.1(a).

- 3) Based on the facts set forth in these FINDINGS, the Depart-

ment has determined that Johnson Matthey, Inc. has violated the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the regulations promulgated pursuant thereto, N.J.A.C. 7:26-1 et seq., specifically N.J.A.C. 7:26-12.1(a).

ORDER

- 4) NOW, THEREFORE, IT IS HEREBY ORDERED THAT JOHNSON MATTHEY, INC. SHALL IMMEDIATELY cease any further violations of N.J.A.C. 7:26-12.1(a) by manifesting off site all hazardous waste in containers (drums) presently stored at the above referenced facility.
- 5) Within twenty (20) calendar days upon receipt of this Order submit the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to:

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Bureau of Field Operations
Southern Field Office
20 East Clementon Road
Gibbsboro, NJ 08026
Attention: Eleanor Peterson

- 6) This Order shall be effective upon receipt.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

- 7) Pursuant to N.J.S.A. 13:1E-9e and based upon the above FINDINGS, the Department has determined that a civil administrative penalty should be assessed against Johnson Matthey, Inc. in the amount of \$17,500.
- 8) Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing, if any, or when this Notice of Civil Administrative Penalty Assessment becomes a final order (see following paragraph). Payment shall be made by certified check payable to "Treasurer, State of New Jersey" and shall be submitted to:

New Jersey Department of Environmental Protection
Division of Financial Management Planning and General Services
Bureau of Revenue
CN 402
Trenton, NJ 08625

12) This Administrative Order and Notice of Civil Administrative Penality Assessment is binding on Johnson Matthey, Inc., its principals, directors, officers, agents, successors,
trustees, any trustee in bankruptcy or other trustee, and any assessors, any receiver appointed pursuant to a proceeding in law or equity.

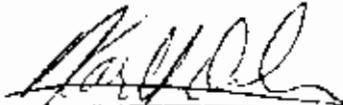
GENERAL PROVISIONS

- a. A statement of the legal authority and jurisdiction
under which the hearing or action to be taken is to be held;
b. A reference to the particular sections of the statute
and rules involved;
c. A short and plain statement of the matters of fact and
law asserted; and
d. The provisions of this Administrative Order and Notice
of Civil Administration Penality Assessment to which each
objection, and any alternative provisions proposed.
- Johnson Matthey, Inc., objects, the reasons for which
of Civil Administration Penality Assessment to which
Penalty Assessment is binding on Johnson Matthey, Inc., its
principals, directors, officers, agents, successors,
trustees, any trustee in bankruptcy or other trustee, and any
assessors, any receiver appointed pursuant to a proceeding in law or equity.
- 11) Johnson Matthey, Inc., shall, in its request for a hearing,
furnish the NJDEP with the following:
a. A statement of the legal authority and jurisdiction
under which the hearing or action to be taken is to be held;
b. A reference to the particular sections of the statute
and rules involved;
c. A short and plain statement of the matters of fact and
law asserted; and
d. The provisions of this Administrative Order and Notice
of Civil Administration Penality Assessment to which each
objection, and any receiver appointed pursuant to a proceeding in law or equity.
- 10) Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.S.A. 13:1E-9,
New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
CN 028
Trenton, NJ 08625
Attn: Executive Director for Enforcement
a. Any hearing request shall be delivered to the
hearing, any hearing request shall be delivered to the
address below within twenty (20) calendar days from receipt
of this Administrative Order and Notice of Civil Adminis-
trative Penality Assessment.

NOTICE OF RIGHT TO A HEARING

- 9) If no request for a hearing is received within twenty (20)
calendar days from receipt of this Notice of Civil Adminis-
trative Penality Assessment, it shall become a final order
upon the twenty-first calendar day following its receipt and
the penalty shall be due and payable.
Johnson Matthey, Inc., is entitled to an administrative hearing.

- 13) Notice is given that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment the Department does not waive its rights to initiate additional enforcement actions.
- 14) No obligations imposed by this Administrative Order and Notice of Civil Administrative Penalty Assessment (with the exception of paragraph 7, above) are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety, welfare and environment.
- 15) Notice is given that pursuant to N.J.S.A. 13:1E-9e, the Department is authorized to assess a civil administrative penalty of not more than \$25,000 for each violation and additional penalties of not more than \$2,500 for each day during which the violation continues after receipt of an administrative order from the Department.
- 16) Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates N.J.S.A. 13:1E-1 et seq. or any code, rule or regulation promulgated thereunder shall be liable to a penalty of not more than \$50,000 per day of such violation, and each day's continuance of the violation shall constitute a separate violation.
- 17) Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates an administrative order issued pursuant to N.J.S.A. 13:1E-9c, or a court order issued pursuant to N.J.S.A. 13:1E-9d, or who fails to pay a civil administrative penalty in full after it is due shall be subject upon order of a court to a civil penalty not to exceed \$100,000 per day of such violation and each day's continuance of the violation shall constitute a separate violation.



Karl J. Delaney
Assistant Director
Hazardous Waste Enforcement

KJD:krb



**State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 020
TRENTON, NEW JERSEY 08625**

GEORGE G. MCGANN, P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

Ms. Barbara A. Curtis
Johnson Matthey Inc.
Corporate Headquarters
4 Malin Road
Malvern, PA 19355-2196

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Ms. Curtis:

JUN 19 1987

RE: NJPDES/SIU Permit Exemption
Johnson Matthey Inc.
West Deptford, New Jersey
EPA I.D. No. NJD 980 755 367

This is in response to your letter to the Bureau of Industrial Waste Management dated July 20, 1984, concerning the classification of Johnson Matthey Inc. as an Industrial Waste Management Facility (IWMF).

The "wastewater treatment unit", which was described in a letter dated September 5, 1986 from Mr. W.L. Keeley, Jr. of the above-referenced facility, has been determined to be under the scope of the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1.1 et seq. The company is subject to the Industrial Waste Management Facility (IWMF) requirements of Subchapter 4 of the New Jersey Pollutant Discharge Elimination System (NJPDES) Regulations, N.J.A.C. 7:14A-1.1 et seq. Enclosed is an IWMF worksheet which shows the basis of our determination.

IWMF's are presently required to obtain individual NJPDES/SIU permits pursuant to N.J.A.C. 7:14A-10.5 (a)(1)(ii). However, most SIU's which are discharging to Publicly Owned Treatment Works (POTW's) that have an Industrial Pretreatment Program (IPP) approved by the New Jersey Department of Environmental Protection (Department) are exempted from the requirement to obtain an individual NJPDES/SIU permit in accordance with N.J.A.C. 7:14A-10.5(f). The Department has changed its policy regarding the implementation of the IWMF Regulations and proposes to extend this exemption to most IWMF's located in POTW areas covered by approved IPP's. Accordingly, the Department will not require you to obtain an individual NJPDES/SIU permit.

IWMF's which do not receive individual NJPDES/SIU permits, however, are deemed to possess a NJPDES/IWMF permit-by-rule (N.J.A.C. 7:14A-4.5(a)(3)) and a NJPDES/SIU permit-by-rule (N.J.A.C. 7:14A-13.5). The conditions applicable to a NJPDES/IWMF permit-by-rule and a NJPDES/SIU permit-by-rule are enclosed with this letter. Permit-by-rule status can be revoked, for cause, as specified in the NJPDES Regulations. As a POTW with an approved IPP, the Gloucester County Utilities Authority (GCUA) is responsible for ensuring your compliance with all environmental regulations affecting your discharge to the sewer system.

This action does not relieve Johnson Matthey Inc. of the responsibility for complying with the hazardous waste generation and accumulation requirements of the New Jersey Hazardous Waste Regulations, N.J.A.C. 7:26-1 et seq. Hazardous waste sludges generated from any wastewater treatment units may accumulate on-site for 90 days or less provided that:

- (1) All such waste is, within 90 days or less, shipped off-site to an authorized facility;
- (2) The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d);
- (3) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;
- (4) The facility complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans, emergency procedures, and personnel training as per N.J.A.C. 7:26-9.4(g).

Any accumulation of such sludges for any period longer than 90 days would constitute a hazardous waste TSD storage facility, and would be subject to regulation under N.J.A.C. 7:26-1 et seq.

If there are any questions concerning this letter, please contact Valentin Kouame of my staff at (609) 292-4860.

Sincerely,

William F. Boehle

William F. Boehle, P.E., Acting Chief
Industrial Pretreatment Section
Bureau of Industrial Waste Management

WQM216:vk

c: Ernest J. Kuhlwein, Jr. - DHWM
Shirlee Schiffman - DHWM
Joel Golumbek - EPA Region II
Carol Whalen - GCUA

INDUSTRIAL WASTE MANAGEMENT FACILITY (IWMF) WORKSHEET

1. Name: JOHNSON MATTHEY INC.
Mailing Address: 2001 NOLTE DRIVE WEST DEPTFORD, N.J. 08066
Location Address: " " "
Facility Contact: WILLIAM L. KEELEY, JR.
Telephone No.: (609) 853-8000 RCRA ID No.: NJD 980 755 367
Facility NJPDES No.: NJ0050121 Type: Former DSW DGW SIU None
Receiving POTW, if any: GCWA POTW NJPDES No. NJ0024686
2. Description of Waste Source(s): GENERATED FROM
MANUFACTURING OPERATIONS OF SECONDARY SMELTING AND
REFINING NON-FERROUS METALS.
3. The Waste Source is:
- Intracompany/Intrastate Intercompany/Intrastate
4. Operational Units comprising the treatment works (describe):
- Unit #1: EQUALIZATION TANK; RECEIVES WASTEWATER GENERATED
Unit #2: TWO(2) BATCH TREATMENT TANKS; TO PRECIPITATE METALS (NICKEL, MERCURY)
Unit #3: VACUUM FILTER; TO DEWATER SLUDGE GENERATED
Unit #4: TWO(2) FINAL STORAGE TANKS; TO HOLD TREATED WASTEWATER
before DISCHARGING TO THE SEWER.
Unit #5:
Unit #6:
5. Criteria (For each item indicate Yes, No, N/A, etc.):
- a. Is there an influent wastewater? YES
Is it hazardous? YES
If yes, list waste type. D002, D007, D008, D011
- b. Does the treatment works generate (G), store (S), or treat (T) a wastewater treatment sludge or residue? YES
If yes, which units are involved, and what function do they perform? 3(T, G)
Is it hazardous? YES
If yes, list waste type(s): D007, D009, D010
- c. Is the unit a "tank" as per NJAC 7:14A-4.3? YES
6. Conclusions: Is the facility an IWMF? YES
7. Comments: THE FACILITY IS NOT A HAZARDOUS WASTE FACILITY (HWF)
because it will STORE CONTAINERIZED/DRUMMED HAZARDOUS WASTE
FOR LESS THAN NINETY (90) DAYS.

/ UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE:

SUBJECT: Possible Illegal Action

FROM: Laura J. Livingston, Chief *Laura Livingston*
Water and Hazardous Waste Compliance Section
Permits Administration Branch

TO: George Meyer, AWM-HWC
Joel Golumbek, AWM-HWC
Bruce Adler, ORC

Bourns, Inc. (EPA ID# IAD005277611) transported hazardous waste to Johnson Matthey Chemical in West Deptford, NJ (EPA ID# NJD980755367). However, Johnson Matthey is listed as a generator only and not a facility to dispose of hazardous waste. The attached application for an ID# does not have an original signature and does not reflect proper location address for number assignment. ORC recommended not assigning another number for Bourns at the West Deptford Site.

We have brought the matter to your attention so that you can take whatever action you feel is appropriate with regard to either company.

ENVIS
U.S. ENVIRONMENTAL PROTECTION AGENCY

1987 JAN 26 AM 11:59

NEW YORK, NY.
AGENCY, REGION II
U.S. ENVIRONMENTAL PROTECTION AGENCY

BOURNS

TRIMPOT DIVISION

April 20, 1987

US EPA Region II
Permits Administration Branch
26 Federal Plaza
New York, New York 10278

Dear Sir or Madam:

Enclosed is a Notification of Hazardous Waste Activity for a one-time removal action at a site in West Deptford, New Jersey.

We respectfully request expedited processing of this document so that we may obtain an EPA identification number as soon as possible and proceed with the removal action. To that end, I will call the agency on May 15, 1987 in the hope that we can receive our EPA ID # by phone (with written confirmation to follow). If the ID # is assigned earlier than May 15th, or you have further questions, please call me at (515) 232-3700 ext. 267.

Thank you for your help.
Sincerely,

Dennis D. Cruikshank
Senior Process Engineer

100-1000-0000
100-1000-0000

807 APR 27 1987

100-1000-0000
100-1000-0000
100-1000-0000

BOURNS, INC. • 300 AIRPORT ROAD, AMES IA 50010 • TELEX 470448, RAPIFAX 515 232-2262, PHONE 515 232-3700

ID — For Official Use Only

C

W

T/A/C

1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

 1. Ignitable
(D001) 2. Corrosive
(D002) 3. Reactive
(D003) 4. Toxic
(D004)**XI. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

SR. PROCESSOR, Engr.

Date Signed

4/20/87

EPA Form 8700-12 (Rev. 11-85) Reverse

R04718
100-100-100
100-100-10066-00-12 38V 100
100-100-100
100-100-100

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 25 1987**Possible Illegal Action**

Laura J. Livingston, Chief
Water and Hazardous Waste Compliance Section
Permits Administration Branch

George Meyer, AWM-HWC
Joel Columbek, AWM-HWC
Bruce Adler, ORC

Bouras, Inc. (EPA ID# IAD005277611) transported hazardous waste to Johnson Matthey Chemical in West Deptford, NJ (EPA ID# NJD980755367). However, Johnson Matthey is listed as a generator only and not a facility to dispose of hazardous waste. The attached application for an ID# does not have an original signature and does not reflect proper location address for number assignment. ORC recommended not assigning another number for Bouras at the West Deptford Site.

We have brought the matter to your attention so that you can take whatever action you feel is appropriate with regard to either company.

CONCURRENCES

SYMBOL	2PM-PA	2PM-PA							
SURNAME	Kappel	Livingston							
DATE	AK 6/23/87	-JL 6/23/87							

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:48 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD980755367	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 06/24/2014		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages: 11 Total Handlers: 1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, citation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

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JOHNSON MATTHEY INC.

County Name / Doce: GLOUCESTER / NJ015

NJD980755367

REGION 02

Location: 2001 NOLTE DRIVE; WEST DEPTFORD, NJ 08066
Mailing: 2001 NOLTE DRIVE; WEST DEPTFORD, NJ 08066

Activity Location: NJ	State District:	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: LOG	Transporter: N	Operating TSDF: ----	IC In Place: N	EI Indicator (HE / GW)N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: Y	HSM: Y	Subpart 4: —	
Full Enforcement: ----	Converter: —	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wkld: N	State TSDF: ----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation	Activity Location: NJ	Type: 265.J	Determined Date: 05/22/2006	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date:			Actual Compliance Date: 06/30/2006	RTC Qualifier: OBSERVED	Sequence Number: 18
Citation Information: Seq #	Type	Citation			
1	FEDERAL REGULATION	265.191(b)			
2	FEDERAL REGULATION	265.192(d)			
3	FEDERAL REGULATION	265.192(e)			
4	FEDERAL REGULATION	265.193(b)(1)			
5	FEDERAL REGULATION	265.193(c)(1)			
6	FEDERAL REGULATION	265.193(c)(2)			
7	FEDERAL REGULATION	265.193(c)(3)			
8	FEDERAL REGULATION	265.193(d)			
9	FEDERAL REGULATION	265.193(e)(1)			
10	FEDERAL REGULATION	265.193(f)			
CEI Evaluation	05/22/2006	Activity Location: NJ	By: State	Identifier: 001	Person: SOTWO Branch: S
Citizen Complaint: NO		Multimedia Inspection: YES	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/22/2006
Found Violation: YES					
Focus Area:					

No Linked Enforcements

Violation	Activity Location: NJ	Type: 262.A	Determined Date: 05/04/2006	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:			Actual Compliance Date: 05/05/2006	RTC Qualifier: DOCUMENTED	Sequence Number: 19
Citation Information: Seq #	Type	Citation			
1	FEDERAL REGULATION	262.10(c)			
CEI Evaluation	05/04/2006	Activity Location: NJ	By: EPA	Identifier: 001	Person: R2JDW Branch: RCB
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 05/04/2006
Found Violation: YES					
Focus Area:					
Enforcement: Activity Location: NJ	Type: 110		Action Date: 05/04/2006	Identifier: 001	
Docket:		Agency: EPA	Responsible Person: R2JDW	Branch: RCB	
CA Component: N	Disposition Status: AS	05/04/06	Appeal Initiated:	Appeal Resolved:	

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued .

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 07/07/2000	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date:	08/07/2000		Actual Compliance Date: 08/17/2001	RTC Qualifier: OBSERVED	Sequence Number: 17
CDT Evaluation	07/07/2000	Activity Location: NJ	By: State	Identifier: 001 Person: SORTG Branch: S	Found Violation: YES
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:	Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 09/29/2001	Identifier: 001	
Docket:		Agency: State	Responsible Person: SORTG	Branch: S	
Penalty Information:	Proposed:	Final Monetary: \$4,500	Collected: \$4,500	Total Final: \$4,500	
CA Component:	N	Disposition Status:			Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 02/03/2001	Identifier: 001	
Docket:		Agency: State	Responsible Person: SOMPC	Branch:	
Penalty Information:	Proposed: \$5,000	Final Monetary:	Collected:	Total Final:	
CA Component:	N	Disposition Status:			Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/07/2000	Identifier: 001	
Docket:		Agency: State	Responsible Person: SORTG	Branch: S	
CA Component:	N	Disposition Status:			Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.B	Determined Date: 06/29/1993	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date:	07/28/1993		Actual Compliance Date: 08/06/1993	RTC Qualifier: OBSERVED	Sequence Number: 11
CSE Evaluation	08/06/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES
Citizen Complaint:	NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:	Focus Area:
CEI Evaluation:	00/29/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES
Docket:		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:	Focus Area:
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 11/10/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: NJMK	Branch: S	
CA Component:	N	Disposition Status:			Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 09/30/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
Penalty Information:	Proposed: \$20,000	Final Monetary:	Collected:	Total Final:	
CA Component:	N	Disposition Status:			Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 08/27/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component:	N	Disposition Status:			Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 06/29/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component:	N	Disposition Status:			Appeal Resolved:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued •

Violation:	Activity Location: NJ	Type: 262.B	Determined Date: 06/29/1993	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 07/29/1993		Actual Compliance Date: 08/24/1993	RTC Qualifier: OBSERVED	Sequence Number: 12
FRR Evaluation	08/24/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES Focus Area:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:		
CEI Evaluation	06/29/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES Focus Area:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:		
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 11/10/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: NJMK	Branch: S	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 08/27/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 06/29/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.B	Determined Date: 06/29/1993	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 07/29/1993		Actual Compliance Date: 08/24/1993	RTC Qualifier: OBSERVED	Sequence Number: 13
FRR Evaluation	08/24/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES Focus Area:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:		
CEI Evaluation	06/29/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES Focus Area:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:		
Enforcement:	Activity Location: NJ	Type: 310	Action Date: 11/10/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: NJMK	Branch: S	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 210	Action Date: 08/27/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 06/29/1993	Identifier: 000	
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ	
CA Component: N	Disposition Status:		Appeal Initiated:		Appeal Resolved:
Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 06/29/1993	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date: 07/29/1993		Actual Compliance Date: 08/05/1993	RTC Qualifier: OBSERVED	Sequence Number: 14
CSE Evaluation	08/06/1993	Activity Location: NJ	By: State	Identifier: 000 Person: R2DEP Branch: NJ	Found Violation: YES Focus Area:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO Day Zero:		

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued -

CEI Evaluation	06/29/1993	Activity Location	NJ	By: State	Identifier:	000	Person:	R2DEP	Branch:	NJ	Found Violation:	YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:			Focus Area:	
Enforcement:	Activity Location:	NJ	Type:	310		Action Date:	11/10/1993		Identifier:	000	Branch:	S
Docket:			Agency:	State		Responsible Person:	NJMK				Appeal Resolved:	
CA Component:	N	Disposition Status:				Appeal Initiated:					Identifier:	000
Enforcement:	Activity Location:	NJ	Type:	210		Action Date:	08/27/1993		Branch:	NJ	Appeal Resolved:	
Docket:			Agency:	State		Responsible Person:	R2DEP				Identifier:	000
CA Component:	N	Disposition Status:				Appeal Initiated:					Appeal Resolved:	
Enforcement:	Activity Location:	NJ	Type:	120		Action Date:	06/29/1993		Identifier:	000	Branch:	NJ
Docket:			Agency:	State		Responsible Person:	R2DEP				Appeal Resolved:	
CA Component:	N	Disposition Status:				Appeal Initiated:					Appeal Resolved:	
Violation:	Activity Location:	NJ	Type:	262.A	Determined Date:	06/29/1993	Determined by Agency:	State	Responsible Agency:	State		
	Scheduled Compliance Date:	07/29/1993			Actual Compliance Date:	08/24/1993	RTC Qualifier:	OBSERVED		Sequence Number:	15	
FRR Evaluation	08/24/1993	Activity Location:	NJ	By: State	Identifier:	000	Person:	R2DEP	Branch:	NJ	Found Violation:	YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:			Focus Area:	
CEI Evaluation	06/29/1993	Activity Location:	NJ	By: State	Identifier:	000	Person:	R2DEP	Branch:	NJ	Found Violation:	YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:			Focus Area:	
Enforcement:	Activity Location:	NJ	Type:	310		Action Date:	11/10/1993		Identifier:	000	Branch:	S
Docket:			Agency:	State		Responsible Person:	NJMK				Appeal Resolved:	
CA Component:	N	Disposition Status:				Appeal Initiated:					Identifier:	000
Enforcement:	Activity Location:	NJ	Type:	210		Action Date:	08/27/1993		Branch:	NJ	Appeal Resolved:	
Docket:			Agency:	State		Responsible Person:	R2DEP				Identifier:	000
CA Component:	N	Disposition Status:				Appeal Initiated:					Appeal Resolved:	
Enforcement:	Activity Location:	NJ	Type:	120		Action Date:	06/29/1993		Identifier:	000	Branch:	NJ
Docket:			Agency:	State		Responsible Person:	R2DEP				Appeal Resolved:	
CA Component:	N	Disposition Status:				Appeal Initiated:					Appeal Resolved:	
Violation:	Activity Location:	NJ	Type:	262.A	Determined Date:	06/29/1993	Determined by Agency:	State	Responsible Agency:	State		
	Scheduled Compliance Date:	07/29/1993			Actual Compliance Date:	08/24/1993	RTC Qualifier:	OBSERVED		Sequence Number:	16	
FRR Evaluation	08/24/1993	Activity Location:	NJ	By: State	Identifier:	000	Person:	R2DEP	Branch:	NJ	Found Violation:	YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NO	Not Subtitle C:	NO	Day Zero:			Focus Area:	
CEI Evaluation	06/29/1993	Activity Location:	NJ	By: State	Identifier:	000	Person:	R2DEP	Branch:	NJ	Found Violation:	YES
Citizen Complaint:	NO	Multimedia Inspection:	NO	Sampling:	NC	Not Subtitle C:	NO	Day Zero:			Focus Area:	
Enforcement:	Activity Location:	NJ	Type:	310		Action Date:	11/10/1993		Identifier:	000	Branch:	S
Docket:			Agency:	State		Responsible Person:	NJMK				Appeal Resolved:	
CA Component:	N	Disposition Status:				Appeal Initiated:					Appeal Resolved:	

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:48 PM

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued -

Enforcement: Activity Location: NJ Docket: CA Component: N	Type: 210 Agency: State Disposition Status: Type: 120 Agency: State CA Component: N	Action Date: 08/27/1993 Responsible Person: R2DEP Appeal Initiated: Action Date: 06/29/1993 Responsible Person: R2DEP Appeal Initiated:	Identifier: 300 Branch: NJ Appeal Resolved: Identifier: 000 Branch: NJ Appeal Resolved:
Enforcement: Activity Location: NJ Scheduled Compliance Date: 06/24/1991	Type: 262.A Actual Compliance Date: 02/04/1992	Determined by Agency: State RTC Qualifier: OBSERVED Identifier: 001 Person: R2DEP Not Subtitle C: NO Day Zero: Identifier: 007 Person: R2DEP Not Subtitle C: NO Day Zero:	Responsible Agency: State Sequence Number: 6 Found Violation: YES Focus Area: Found Violation: YES Focus Area:
CSE Evaluation 02/04/1992 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	Action Date: 05/24/1991 Responsible Person: R2DEP Appeal Initiated:	Identifier: 003 Branch: Appeal Resolved:
CEI Evaluation 05/24/1991 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	Action Date: 05/24/1991 Responsible Person: R2DEP Appeal Initiated:	Identifier: 003 Branch: Appeal Resolved:
Enforcement: Activity Location: NJ Docket: CA Component: N	Type: 120 Agency: State Disposition Status:	Determined by Agency: State RTC Qualifier: OBSERVED Identifier: 000 Person: R2DEP Not Subtitle C: NO Day Zero: Identifier: 007 Person: R2DEP Not Subtitle C: NO Day Zero:	Responsible Agency: State Sequence Number: 10 Found Violation: YES Focus Area: Found Violation: YES Focus Area:
Enforcement: Activity Location: NJ Scheduled Compliance Date: 06/24/1991	Type: 262.A Actual Compliance Date: 02/04/1992	Determined by Agency: State RTC Qualifier: OBSERVED Identifier: 001 Person: R2DEP Not Subtitle C: NO Day Zero: Identifier: 007 Person: R2DEP Not Subtitle C: NO Day Zero:	Responsible Agency: State Sequence Number: 10 Found Violation: YES Focus Area: Found Violation: YES Focus Area:
CSE Evaluation 02/04/1992 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	Action Date: 05/24/1991 Responsible Person: R2DEP Appeal Initiated:	Identifier: 003 Branch: Appeal Resolved:
CEI Evaluation 05/24/1991 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	Action Date: 05/24/1991 Responsible Person: R2DEP Appeal Initiated:	Identifier: 003 Branch: Appeal Resolved:
Enforcement: Activity Location: NJ Docket: CA Component: N	Type: 262.A Actual Compliance Date: 01/02/1992	Determined by Agency: State RTC Qualifier: UNVERIFIABLE Identifier: 006 Person: R2DEP Not Subtitle C: NO Day Zero: Action Date: 02/14/1990 Responsible Person: R2DEP Appeal Initiated:	Responsible Agency: State Sequence Number: 5 Found Violation: YES Focus Area: V3 Identifier: 004 Branch: Appeal Resolved:
FCL Evaluation 02/14/1990 Citizen Complaint: NC	Activity Location: NJ Multimedia Inspection: NO	Action Date: 02/14/1990 Responsible Person: R2DEP Appeal Initiated:	
Enforcement: Activity Location: NJ Docket: CA Component: N	Type: 120 Agency: State Disposition Status:		

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: June 24, 2014 - 1:48 PM

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued -

Enforcement	Activity Location: NJ Scheduled Compliance Date:	Type: 262-A Determined Date: 02/29/1984 Actual Compliance Date: 03/22/1984	Determined by Agency: State RTC Qualifier: OBSERVED	Responsible Agency: State Sequence Number: 1
NRR Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: Day Zero: Focus Area: Found Violation: YES
Enforcement	Activity Location: NJ Docket: CA Component: N	Typ: 120 Agency: State Disposition Status:	Action Date: 02/29/1984 Responsible Person: Appeal Initiated:	Identifier: 301 Branch: Appeal Resolved:
<hr/>				
Evaluations With No Violations:				
CEI Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: 11/27/2013 Focus Area: Found Violation: NO
CEI Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: 11/28/2010 Focus Area: Found Violation: NO
CEI Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTANM Day Zero: 03/06/2009 Focus Area: Found Violation: NO
NRR Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: 08/16/2006 Focus Area: Found Violation: NO
SNN Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: Focus Area: Found Violation: NO
ENY Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: 05/30/2006 Focus Area: Found Violation: NO
CDE Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTWO Day Zero: Focus Area: Found Violation: NO
CSE Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SCRTG Day Zero: Focus Area: Found Violation: NO
SNN Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 002 Not Subtitle C: NO	Branch: SORCR Day Zero: Focus Area: Found Violation: NO
CDE Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 031 Not Subtitle C: NO	Branch: SOTG Day Zero: Focus Area: Found Violation: NO
CEI Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTMH Day Zero: Focus Area: Found Violation: NO
CEI Evaluation	Activity Location: NJ Citizen Complaint: NO	By: State Multimedia Inspection: NO Sampling: NO	Identifier: 001 Not Subtitle C: NO	Branch: SOTMH Day Zero: Focus Area: Found Violation: NO

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JOHNSON MATTHEY INC., NJD980755367, WEST DEPTFORD, NJ, continued -

SNN Evaluation	06/05/1993	Activity Location: NJ Multi media Inspection: NO	By: State Sampling: NO	Identifier: CV3 Not Subfile C: NO	Person:	Branch:	Found Violation: NO Focus Area:
SNY Evaluation	06/29/1993	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: CNV Not Subfile C: NO	Person:	Branch:	Found Violation: N/A Focus Area:
CSE Evaluation	02/05/1990	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 005 Not Subfile C: NO	Person: R2DEP	Branch:	Found Violation: NO Focus Area:
CEI Evaluation	03/18/1987	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 014 Not Subfile C: NO	Person: R2DEP	Branch:	Found Violation: NO Focus Area:
FCI Evaluation	03/09/1987	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 003 Not Subfile C: NO	Person: R2DEP	Branch:	Found Violation: NO Focus Area:
CEI Evaluation	12/12/1984	Activity Location: NJ Multimedia Inspection: NO	By: EPA Oversight Sampling: NO	Identifier: 002 Not Subfile C: NO	Person:	Branch:	Found Violation: NO Focus Area:

Orphan Enforcement Actions:

Enforcement #: NJ	Type: 210	Action Date: 09/20/1993	Identifier: ODC
Bucket:	Agency: State	Responsible Person: NJRCR	Branch: S
Penalty Information:	Proposed: \$20,000	Final Monetary: \$12,500	Collected: Total Fine: \$12,500
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ("Y" indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - Blf; S - Storage; T - Treatment)
I/C In Place	Indicates that the facility has Institutional Controls in place. ("Y" indicates that the facility is in this universe).
El Indicator (THE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposure ("+" indicates the exposure exists and is under control; "Y" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist) GW - Groundwater Release ("+" indicates the exposure exists and is under control; "Y" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - Blf; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ("Y" indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ("Y" indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - Blf; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - Blf; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe)

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Description of codes used on the report:

ACCESSIBILITY - Indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	Indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	Indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution
L	Indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	Indicates that the handler is a former non-notifier.
X	Indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262.B	GENERATORS - MANIFEST
265.J	TSD IS-TANK SYSTEM STANDARDS

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
FCL	FOCUSSED COMPLIANCE INSPECTION
FRR	FINANCIAL RECORD REVIEW
NFR	NON-FINANCIAL RECORD REVIEW
SNV	NOT A SIGNIFICANT NON-COMPLIER
SNY	SIGNIFICANT NON-COMPLIER

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Description of codes used on the report:

Focus Area	Description
V3	CONVERTED FROM V2 RCRAINFO

Enforcement Type	Enforcement Description
110	VERBAL INFORMAL
120	WRITTEN INFORMAL
210	INITIAL 3008(A) COMPLIANCE
310	FINAL 3008(A) COMPLIANCE ORDER

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